

**Appendices** 

Appendix 79

# Comments and Responses on the Draft GMP/EIS

This section presents the agency, organization and individual public comments received on the Draft GMP/EIS. Federal guidelines specify that NPS give responses to comments that are "substantive". Comments are considered substantive when they:

- Reasonably question the accuracy of information
- Reasonably question the adequacy of analysis
- Present reasonable alternatives other than those presented
- Cause changes or revisions to the proposal

Substantive comments raise, debate or questions a point of fact or policy. Comments in favor of or against one

alternative (or component of an alternative), outside the scope of the plan, stating opinion, or that agree or disagree with NPS policy, are not considered substantive; however, all letters, e-mails and other written correspondence are read and considered. Park staff replied to comments requesting clarification or making detailed suggestions, even if these comments are not defined as "substantive". Even so, it may appear that some thoughtful and useful ideas were not heard. This is not the case. Although a comment may not have triggered a reply from us, or caused a change to the GMP or EIS, these ideas and suggestions, many of which are more appropriate to subsequent planning, are documented in this record and will be taken into consideration as implementation plans are developed.

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#### **RESPONSE • LETTERS**



U.S. Army Corps of Engineers Norfolk District, June 16, 2004

Project Number: 04-R2014

Waterway: None Listed

1. Participant:

United States Department of Interior National Park Service Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, VA 23803 Authorized Agent: None

3. Address of Job Site:

1539 Hickory Hill Road, Petersburg, Virginia, 23803-4721

4. Project Description:

Petersburg National Battlefield expansion draft environmental impact statement review

5. Finding

We have reviewed your draft EIS as requested. Since the document did not contain a sufficiently detailed alternatives analysis identifying actual or approximated impacts to jurisdictional waters and/or wetlands we are not able to ascertain what if any Corps concerns may exist. However, a cursory survey of available research materials revealed extensive waters and wetlands of the US exist within of some of the alternatives. Preservation of these resources is highly desirable from an environmental perspective. If the Park Service is able to acquire and subsequently protect waters and wetlands, a better stewardship of the resource may result other than allowing the resources fall prey to urban sprawl.

If further consideration is desired for review of the subject alternatives, jurisdictional waters and wetlands must be identified and quantified. Proposed impacts to jurisdictional waters and wetlands such as building and road plans etc. must be superimposed over a Corps confirmed jurisdictional delineation in accordance with the 1987 Wetland Delineation Manual and submitted to this office. Upon receipt, we will evaluate potential impacts for avoidance, minimization, and mitigation of the resources in accordance with the Clean Water Act and provide appropriate guidance.

6. Corps Contact: Julie L. Sunderlin (434)645-7173

Nicholas L. Konchuba

Cheif, Easter Virginia Regulatory Section

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NPS concurs with the USACE that plans for proposed project activities in the vicinity of jurisdictional waters and/or wetlands would be superimposed over a USACE confirmed jurisdictional delineation in accordance with the 1987 Wetland Delineation Manual and submitted to the Norfolk District office prior to the implementation of any activity. Activity would occur only after evaluation of the project by USACE for avoidance, minimization and mitigation of potential impacts to the resources in accordance with the Clean Water Act and guidance form USACE.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

June 29, 2004

Mr. Bob Kirby National Park Service Petersburg National Battlefield 1539 Hickory Hill Road Petersburg Virginia 23803-4721

Re: Petersburg National Battlefield Draft General Management Plan Environmental Impact Statement

Dear Mr. Kirby:

In accordance with the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) offers the following comments regarding the Petersburg National Battlefield, Draft General Management Plan and Environmental Impact Statement.

The Petersburg National Battlefield (PNB) consists of several park units located in and around Petersburg, Virginia. The PNB protects and interprets resources associated with the campaign, siege and defense of Petersburg that occurred between June 1864 and April 1865. The Petersburg National Battlefield Draft General Management Plan Environmental Impact Statement (GMP/EIS) evaluates four potential management options for the battlefield units. These include the no action alternative and three new management options that vary in the approach and intensity of interpretation and resource protection.

The purpose and need for the GMP/EIS is based on the recognition that much of the historic battlefield of the civil war has been lost and the remaining areas not under conservation easement or state or federal protection are under a high degree of threat for conversion to residential, commercial and Industrial development. In order to further its mission of preservation and protection of battlefield resources and maintaining high quality facilities and interpretation programs, three management options, in addition to the no action (Alternative A), were developed and evaluated in the GMP/EIS.

The action alternatives include Alternative B, which proposes a new National Battlefield boundary extension of over 7000 acres, a new visitor contact station and some new approaches to interpretation. Alternative C proposes a new boundary of just over 2000 acres while developing more extensive modern interpretation programs. Alternative D proposes a boundary of over 7000 acres, developing a more extensive modern interpretation program and rehabilitation of the civil war landscape at key sites. The alternatives have additional features common to each which include; protection and maintenance of existing sites and structures, rehabilitation of the Poplar Grove National Cemetery, development of an archive for historic artifacts and documents, no new monuments, new interpretive programs, guidelines for locating new facilities, agricultural leasing, and other management elements.

The effected environment includes rural woodlands and agricultural land, urban and suburban areas, battlefields, civil war earthworks, historic structures, fort sites, railroads, roads and road traces, historic monuments, recreation sites and archeological resources.

It appears that there will be no significant adverse environmental consequences from any of the action alternatives. In fact, each of the action alternatives will help protect nationally significant historic resources and aide in the protection of farmland, natural resources, wetlands, streams and water quality

Thank you for your comments.

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The action alternatives will result in some changes to the pattern of land cover in the proposed expansion areas. The most notable will be the protection of between 1000-4000 acres of prime farmland, depending on the alternative chosen. New agricultural leases will be established to maintain the farmland. However the restoration of the landscape to the 1864-65 time frame under alternative D, while not quantified, may result in large-scale permanent changes in land cover. Both existing forest may be cleared and some open areas will be allowed to return to forest. These changes appear to be relatively minor in light of resource loss from the potential land uses at these sites if not protected; residential, commercial or industrial development. The GMP/EIS outlines current and future coordination efforts among local officials, and state and federal resource and permitting agencies to address potential concerns with the vegetation management program.

Each of the action alternatives will result in minor new construction or rehabilitation activities, trail construction and wayside and pull off development. There is no indication that these will be significant in scope or impact. The GMP/EIS outlines current and future coordination efforts among local officials and state and federal resource and permitting agencies to address potential concerns. EPA encourages this coordination and will be happy to work with the NPS in developing site specific development plans.

On balance it appears that the environmental and cultural benefits of the action alternatives far out weigh any potential impacts to vegetation or other natural resources. With over 7000 acres of proposed new park boundary and associated protection, Alternatives B and D will offer protection not only to historic sites and battlefields but will also offer protection to natural resources and water quality as well. Alternative C, with a smaller boundary expansion, offers less protection of cultural and natural resources than Alternatives B and D. EPA rates the action alternatives with a Lack of Objections (LO).

The no action alternative keeps in place the 1965 management plan and will not result in any new management prescriptions or offer any additional historic or natural resource protection. EPA is concerned that the no action alternative will lead to additional loss of civil war battlefields, historic sites and associated natural resources. The lands described for protection in the GMP/EIS are located outside a growing metropolitan area. The GMP/EIS describes in detail the historic loss of civil war sites and the continuing threat from development. EPA rates this alternative with Environmental Concern (EC).

Although the GMP/EIS does not provide design level detail regarding the vegetation management plan or specific facility construction, overall the GMP/EIS is adequate for comparing the alternatives and understanding the general scope of activities. In addition the GMP/EIS describes future coordination of specific development plans with local, state and federal agencies. Consequently, EPA rates the document as adequate (1).

In summary EPA offers a split rating for the GMP/EIS with the Action Alternatives as LO-1 and the No Action Alternative as EC-1.

If you have any questions or comments please feel free to contact me, or Peter Stokely of my staff at 703-648-4292.

Sincerely,

William Hoffman, Chief Environmental Programs Branch

#### **RESPONSE • LETTERS**



#### United States Department of the Interior

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#### FISH AND WILDLIFE SERVICE

Ecological Services 6669 Short Lane Gloucester, VA 23061

June 14, 2004

Memorandum

To:

Mr. Bob Kirby, Superintendent, Petersburg National Battlefield

From:

Supervisor, Virginia Field Office

Subject:

Draft General Management Plan / Environmental Impact Statement for Petersburg

National Battlefield (Sec 7-2603)

The U.S. Fish and Wildlife Service (FWS) has reviewed your March 2004 draft General Management Plan / Environmental Impact Statement that we received on June 2, 2004. Petersburg National Battlefield is comprised of several parcels in the Counties of Prince George and Dinwiddie and the City of Petersburg, Virginia. The following comments are provided under provisions of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

The document states that the Virginia Department of Conservation and Recreation, Division of Natural Heritage conducted the most recent comprehensive survey for rare species in 1990-1991. Due to the transient nature of some natural resources, we recommend comprehensive surveys be conducted every ten years.

In our August 13, 2002 letter, we provided general comments to the effect that any of the conceptual alternatives were not likely to adversely affect federally listed species. After reviewing this document, we continue to believe that the implementation of any of the alternatives is not likely to adversely affect federally listed species.

If you have any questions, please contact Mr. Eric Davis at (804) 693-6694, extension 104.

Karen L. Mayne

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NPS will continue to seek updated information concerning the presence of species of concern from the VA DCR as it implements the provisions of the General Management Plan.

**RESPONSE • LETTERS** 

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## COMMONWEALTH of VIRGINIA

W. Tayloe Murphy, Jr.

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick Director

Tel: (804) 387-2323 Fax: (804) 367-2391 TDD: (804) 367-2386 www.dhr.atate.va.us

August 6, 2004

Bob Kirby, Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, VA 23803

RE: Comments on Draft General Management Plan/Environmental Impact Statement

Dear Superintendent Kirby:

Thank you for the opportunity to comment on the Draft General Management Plan for Petersburg National Battlefield. We support a general vision for the GMP that includes full exploration and development of opportunities for partnership for the protection, stewardship and interpretation of battlefield lands. We also believe strongly in using the historic resources in Old Town Petersburg to connect the history of those resources and the stories they can tell about Civil War life to the battlefields themselves to provide a more complete interpretation of the war, its impacts and its consequences.

For that reason, we are pleased to see alternatives that would establish a vital presence in downtown Petersburg in cooperation with the City and other partners. As you know from our earlier comments on the conceptual alternatives developed, we favor a plan that will use the historic resources and cityscape of Old Town Petersburg to ensure that the history of the causes, character and consequences of the American Civil War will be told to the broadest possible audience and in the most comprehensive and compelling way. Using Old Town Petersburg in telling the story of the impact of the Civil War on civilian life, including the lives of women and African Americans, for example, makes that story accessible to a larger percentage of visitors and at the same time links that story more compellingly to the stories told by the battlefields.

In answering the five questions you outlined to guide thinking on the plan, Alternative D appears to us to be the one that would provide visitors with the best opportunity to experience the complex story of the Petersburg Campaign – both within historic downtown Petersburg and on the landscape of the battlefields. Alternative D appears to be the alternative under which partnerships for protection and for interpretation are maximized, and under which the appropriate facilities for a more comprehensive education about the Civil War are best provided. Alternative D also provides potential for protecting a greater percentage of battlefield land not currently under protection.

Administrative Services 10 Courthouse Avenue Petersburg, VA 28808 Tel: (804) 863-1624 Fax: (804) 862-6196 Capital Region Office 2801 Kensington Ave. Richmond, VA 23221 Tel: (804) 267-2323 Fax: (804) 267-2391 Portamouth Region Office 612 Court Street, 3rd Floor Portamouth, VA 28704 Tel: (757) \$96-6707 Fax: (757) 396-6712 Roanoke Region Office 1020 Pentrut: Ave., SE Roanoke, VA 24013 Tel: (540) 857-7585 Fax: (540) 857-7588 Winchester Region Office 107 N. Kent Street, Suite 203 Winchester, VA 22801 Tel: (640) 722-3427 Fax: (640) 722-7535 NPS will consult with the Department of Historic Resources prior to actions that potentially affect cultural resources as outlined in the Draft GMP/EIS under Agency Consultation on page 186.

We support an explicit policy commitment in the plan to protect the nationally significant qualities of the park as well as related resources currently beyond the Park boundary, to the fullest extent feasible, based on careful study of the integrity of any battlefield lands or other historic resources considered for acquisition. We encourage the park to consider the use of easements and other conservation techniques to preserve battlefield lands when outright acquisition is neither feasible nor possible.

With Alternative D's potential for productive partnerships for expanded interpretation, we believe that it is the alternative that will best enhance the interpretative themes at Petersburg National Battlefield to appeal to the broadest possible audience in the most comprehensive and compelling way. It is the alternative that would best encourage visitors to make the historical connection between the historic resources in the "Besieged City" and the battlefields and other park units for a more complete understanding of the Civil War. And, at the same time, it is an alternative that would encourage greater protection for the battlefields that are perhaps the most poignant landmarks of this period in our nation's history. It is a high standard under which, we believe, all interested local governments and the larger regional community can rally in support of the plan and its implementation, from Hopewell, to Dinwiddie, to Petersburg.

With regard to the level of impacts on cultural resources, Alternatives D likely poses potential actions that would affect historic resources such as battlefields, earthworks, and historic buildings. The Department, of course, is committed to working with the Park to help you meet and carry out environmental review responsibilities accompanying these actions so as to minimize the impacts on historic resources. At this stage in the proceedings, however, it would appear that Alternative D is the most environmentally sensitive alternative because it will result in extending stronger protection over a greater area of battlefield land and over a greater number of significant historic resources.

Thank you again for this opportunity to comment on the draft alternatives. If the Department can provide additional assistance, please feel free to contact me.

Sincerely,

Kathleen S. Kilpatrick State Historic Preservation Officer

## **RESPONSE**



# COMMONWEALTH of VIRGINIA

#### DEPARTMENT OF ENVIRONMENTAL QUALITY

W. Tayloe Murphy, Jr. Secretary of Natural Resources Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P.O. Box 10009, Richmond, Virginia 23240
Fax (804) 698-4500 TDD (804) 698-4021
www.deq.state.ya.us
July 27, 2004

Robert G. Burnley Director (804) 698-4000 1-800-592-5482

Mr. Bob Kirby Superintendent Petersburg National Battlefield National Park Service 1539 Hickory Hill Road Petersburg, Virginia 23803

RE: Petersburg National Battlefield Draft General Management Plan and Environmental Impact Statement DEQ-04-106F

Dear Mr. Kirby:

The Commonwealth of Virginia has completed its review of the above Draft General Management Plan and Environmental Impact Statement (hereinafter "Draft Plan/EIS"). The Department of Environmental Quality is responsible for coordinating Virginia's review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. The following agencies, planning district commission, and locality took part in this review:

Department of Environmental Quality
Department of Agriculture and Consumer Services
Department of Conservation and Recreation
Department of Transportation
Department of Historic Resources
Department of Mines, Minerals, and Energy
Department of Forestry
Crater Planning District Commission
City of Petersburg
Prince George County.

In addition, the Department of Game and Inland Fisheries, the Department of Health, and Dinwiddie County were invited to comment.

NPS acknowledges the comment from VDACS requesting consideration of state-listed species in the environmental assessment of proposed activities. As stated in DCR's letter of comment on the Petersburg Draft GMP/EIS, June 23, 2004 - under a Memorandum of Agreement, the DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The proposed activities will not affect any documented state-listed plants or insects

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Description of Action

The National Park Service (hereinafter "the Park Service") proposes a new General Management Plan for the future of the Petersburg National Battlefield. The Draft Plan/EIS analyzes four alternatives plans:

Alternative A, the "no action" alternative, describes the current management of the Park and retention of its boundary of approximately 2,659 acres (Draft Plan/EIS, page 50).

Alternative B focuses on saving the battlefield sites and includes authorization for Park expansion of approximately 7,238 acres (Draft Plan/EIS, page 67).

Alternative C focuses on greater interpretive capability and interactive learning about the Park and the history it represents, and includes authorization for a smaller Park expansion of approximately 2,030 acres (Draft Plan/EIS, page 74).

Alternative D, the environmentally preferable alternative (Draft Plan/EIS, pages 176-177) focuses on telling the Civil War story through the cultural landscape, and includes authorization for expansion similar to Alternative B (Draft Plan/EIS, page 81).

**Environmental Impacts and Mitigation** 

The Department of Conservation and Recreation and the City of Petersburg have expressed their support for Alternative D, the environmentally preferred alternative.

1. Natural Heritage Resources. The Department of Conservation and Recreation has searched its Biotics Data System for occurrences of natural heritage resources in the National Battlefield and vicinity. "Natural heritage resources" are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, significant geologic formations, and similar features of scientific interest. Natural heritage resources have been documented in the areas covered by the Plan, but because of the scope of proposed activities and the distance to the resources, the Department of Conservation and Recreation does not anticipate that any of the Plan alternatives would adversely affect the natural heritage resources in question.

The Draft Plan/EIS discusses the presence of a granitic flatrock natural vegetation community on Park lands in the Five Forks Area (pages 89, 112, and 115). The Department of Conservation and Recreation's Division of Natural Heritage has noted this community, but determined that due to its size and quality, it is not considered to be a significant natural community. Additional information on this point is available from the Department of Conservation and Recreation (Karen Patterson, telephone 786-5990).

Page 3
Item #1 Department of Conservation and
Recreation and the Department of Agriculture
and Consumer Services

NPS appreciates the DCR's search of their Biotics system and their indication that although natural heritage resources have been documented in the project vicinity, the scope of the proposed activities and the distance to the resources, they do not anticipate that any of the alternatives will adversely impact those natural heritage resources including a small Granitic Flatrock Community at Five Forks. NPS agrees that should a significant amount of time pass before construction activity occurs, NPS will request updated Biotics information for the proposed activity location.

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Under a memorandum of agreement between the Department of Conservation and Recreation (DCR) and the Department of Agriculture and Consumer Services (VDACS), DCR represents VDACS in comments on potential impacts on state-listed endangered and threatened plant and insect species. According to DCR, the activities contemplated by the Plan will not affect any such resources.

The Department of Agriculture and Consumer Services (VDACS) indicates that several plant and insect species that are on the state list of threatened and endangered species do not occur on the federal list. VDACS requests that the Park Service consider these species in considering the environmental impact of activities proposed under the Plan.

2. Air Quality. According to DEQ's Division of Air Program Coordination, the National Battlefield Park, apart from its Dinwiddie County portion, is in a non-attainment area for the 8-hour ozone air quality standard. Accordingly, precautions must be taken, during any construction activity contemplated in the Plan, to restrict emissions of volatile organic compounds and oxides of nitrogen.

Also, during any construction activities contemplated in the Plan, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the Regulations for the Control and Abatement of Air Pollution. These precautions include, but are not limited to, the following:

- · Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- · Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

In addition, if activities contemplated under the Plan should include the burning of construction or demolition material, the activities must meet the requirements of the Regulations for open burning (9 VAC 5-40-5600 et seq.), and may require a permit (see "Regulatory and Coordination Needs," item 1, below). The Regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. The Park Service should contact Petersburg, Dinwiddie, or Prince George County officials to determine what local requirements, if any, apply. The model ordinance includes, but is not limited to, the following provisions:

- All reasonable effort shall be made to minimize the amount of material burned, with the number and size of the debris piles;
- · The material to be burned shall consist of brush, stumps and similar debris

Page 3-4 2. Air Quality

The NPS will comply with the requirements of the VA Regulations for the Control and Abatement of Air Pollution (9 VAC 5-50-60 et seq.), and other federal and state laws and policies encouraging the reduction of emissions of volatile organic compounds and oxides of nitrogen as well as fugitive dust during any construction activity contemplated in the Plan in order to reduce air pollution.

In addition, NPS notes the comments regarding the requirements of Regulations for open burning (9 VAC 5-40-5600 et seq.) of construction or demolition material and that a permit maybe required. Further, NPS will contact the City of Petersburg, Dinwiddie and/or Prince George County officials to determine what local requirements, if any, apply for open burning. NPS may contact DEQ's Piedmont Regional Office with questions relating to the requirements for open burning of debris or use of fuel burning equipment at construction sites.

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waste and clean burning demolition material;

- The burning shall be at least 500 feet from any occupied building unless the occupants have given prior permission, other than a building located on the property on which the burning is conducted;
- The burning shall be conducted at the greatest distance practicable from highways and air fields;
- The burning shall be attended at all times and conducted to ensure the best possible combustion with a minimum of smoke being produced;
- The burning shall not be allowed to smolder beyond the minimum period of time necessary for the destruction of the materials; and
- The burning shall be conducted only when the prevailing winds are away from any city, town or built-up area.

3. Water Quality. According to the Draft Plan/EIS, there appear to be several hundred acres of surface waters, including wetlands, throughout the Park. DEQ's Division of Water Quality indicates its understanding that this estimate was based on National Wetland Inventory (NWI) maps, and recommends that soil information be analyzed to include areas within the Battlefield that contain hydric soils or soils with hydric inclusions. This information can be downloaded in a Geographic Information System (GIS) program from the U.S. Department of Agriculture's Natural Resources Conservation Service. The web site is:

http://www.ncgc.nrcs.usda.gov/branch/ssb/products/ssurgo/data/va.html.

According to DEQ's Division of Water Quality, the location and extent of direct surface water and wetland impacts from activities contemplated by the Plan are impossible to determine at this time. Therefore, any construction activities under the Plan should be preceded by field verification of the presence of surface waters. If waters or wetlands are found to be present, DEQ's Division of Water Quality recommends that the Park Service delineate the wetland areas in question and have the Army Corps of Engineers (Norfolk District, Regulatory Branch) verify their presence. The likelihood of direct wetland or surface water impacts can then be evaluated.

Future development must be carried out in accordance with all applicable federal and state laws governing wetlands. Section 404(b)(1) guidelines of the Clean Water Act and state laws require avoidance of wetlands as the first step in the mitigation process. See "Regulatory and Coordination Needs," item 2, below.

In the event any construction is proposed, it should be accomplished in strict accordance with applicable Erosion and Sediment Control rules and Stormwater Management rules (see "Regulatory and Coordination Needs," item 3, below). In addition, the Park Service should monitor construction activities to ensure that erosion

# Page 4-5 3. Water Quality

The NPS Draft GMP/EIS provided general information on the acreage of surface waters, including wetlands through the Park based on the NWI maps. The recommendation of the VADEQ-Department of Water Quality to include the areas containing hydric soils is noted. Hydric soils information for the Park was obtained and reviewed in addition to the NWI in preparing the resource description during the preparation of the Draft GMP/EIS. Prior to any construction activity the NPS will identify, survey, and delineate the extent of wetlands in a project area and have the U.S. Army Corps of Engineers (USACE, Norfolk District, Regulatory Branch) verify their presence to determine regulatory jurisdiction. NPS further acknowledges that any specific project development activities will be accomplished in accordance with applicable federal and state laws governing wetlands including Section 404 (b)(1) guidelines of the Clean Water Act.

When construction activities are implemented they will be accomplished in accordance with applicable Erosion and Sediment Control rules and Stormwater Management rules. NPS notes the recommendation of DCR to contact their James River Watershed Office to obtain assistance in Erosion and Sediment Control Plan and Stormwater Management Plan development and implementation. NPS will monitor the construction activities to ensure that erosion controls and stormwater management is effectively preventing sediment and pollutants from entering adjacent water bodies and wetlands. NPS further understands that a Virginia Pollutant Elimination System (VPDES) stormwater general permit may be required if more than 1 acre of land is disturbed.

## COMMENT

Mr. Bob Kirby Page 5

controls and stormwater management facilities are effectively preventing sediment and pollutant migration into adjacent wetlands and surface waters.

4. Solid and Hazardous Waste Management. Solid and hazardous waste issues and sites were adequately addressed in the Draft Plan/EIS, according to DEQ's Waste Division. The document included a search of waste-related data bases. DEQ's Waste Division also conducted a cursory review of its data files and identified large- and small-quantity generators of hazardous waste in the vicinity of the Battlefield, as follows:

- · Large-quantity generators:
  - Chaparral Virginia., Inc. (VAR000013292)
  - Industrial Galvanizers of Virginia (VAR000010215)
- · Small-quantity generators:
  - CSX Transportation (VAD043541242)
  - Norfolk and Western Railway (VAR000004754).

The following web sites may be helpful in locating additional information regarding these identification numbers:

- · http://www.epa.gov/echo/search by permit.html and
- http://www.epa.gov/enviro/html/rcris/rcris query java.html.

In the event any structures are to be demolished as part of the activities contemplated by the Plan, they should first be checked for the presence of asbestos-containing materials and lead-based paints (see "Regulatory and Coordination Needs," items 4(a) and 4(b), below).

5. Erosion and Sediment Control Plans; Stormwater Management Plans. Many of the proposed improvements discussed in the Draft Plan/EIS involve various types of land disturbances. In this regard, the Park Service should keep in mind that Federal agencies and their authorized agents conducting regulated land-disturbing activities on public and private lands in Virginia must comply with the Virginia Erosion and Sediment Control Law, the Virginia Stormwater Management Law, and other applicable federal non-point source pollution control mandates such as section 313 of the Clean Water Act and the federal consistency requirements of the Coastal Zone Management Act. Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, or other structures, soil/dredge spoil areas, or related land conversion activities that disturb 10,000 square feet or more (2,500 square feet or more in Chesapeake Bay

#### **RESPONSE**

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4. Solid and Hazardous Waste Management

NPS acknowledges that VA-DEQ Waste Division found that solid and hazardous waste issues and sites were adequately addressed in the Draft Plan/EIS. NPS appreciates the Waste Division's providing additional information on two large-quantity and two small-quantity generators in the vicinity of the Petersburg National Battlefield. This information will be considered when specific project planning activities are undertaken.

When undertaking specific construction projects, NPS will test and dispose of any soil suspected of contamination or wastes that are generated in accordance with applicable federal, state, and local laws and regulations including but not limited to, the Virginia Waste Management Act (Virginia Code sections 10.1-1400 et. seq.), the Virginia Hazardous Waste Management Act (9 VAC 20-60), and the Virginia Solid Waste Management Regulations (9 VAC 20-80).

NPS further acknowledges the recommendation that structures to be demolished be checked for the presence of asbestos-containing materials and lead-based paints. As stated on page 88 of the GMP/EIS, when \ implementing specific projects, lead paint and other toxic materials would be removed, encapsulated, or otherwise addressed according to federal guidelines if (1) the building is used for housing and that employee has a child under the age of seven years of age or (2) if the building is used as a public space and the paint is loose or flaking. Written certification of the absence of hazardous materials would be required by the NPS.

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#### **RESPONSE • LETTERS**

Mr. Bob Kirby Page 6

Preservation Areas) are regulated by the Erosion and Sediment Control Law and its implementing regulations. Similar activities that disturb one acre or more are regulated by the Stormwater Management Law and its implementing regulations. Accordingly, the Park Service should prepare and implement Erosion and Sediment Control Plans and Stormwater Management Plans to ensure compliance with state law. The Park Service is ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliance, and/or other mechanisms consistent with Park Service policy. See "Regulatory and Coordination Needs," item 3, below.

6. Historic Structures and Archaeological Resources. The Department of Historic Resources expects that the Park Service will consult with the Department pursuant to section 106 of the National Historic Preservation Act with regard to activities contemplated by the Plan. See "Regulatory and Coordination Needs," item 5, below.

7. Chesapeake Bay Preservation Areas. According to the Department of Conservation and Recreation's Division of Chesapeake Bay Local Assistance, the portions of the National Battlefield Park in Dinwiddie County are not subject to the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 et seq.), but the other parts of the Park, within the Cities of Petersburg and Hopewell and Prince George County, must be consistent with the Regulations and the Chesapeake Bay Preservation Act (Virginia Code sections 10.1-2100 et seq.).

All portions of the Park within Petersburg and Hopewell would be considered Resource Management Areas, as would areas within designated watersheds in Prince George County. Accordingly, all portions of the Park should be managed consistently with the general performance standards in the <u>Regulations</u>. This would include the following:

- disturbing no more land than necessary to provide for the proposed use;
- saving indigenous vegetation to the maximum extent practicable, consistent with the proposed use;
- having a soil and water quality conservation assessment for lands retained in agriculture; and
- adhering to water quality protection procedures prescribed by the Virginia Department of Forestry for silvicultural activities.

In addition, Resource Protection Areas should be established and maintained according to the local governments' designations. Where existing buffers do not include woody Page 5-6

5. Erosion and Sediment Control Plans; Stormwater management Plans

When undertaking specific improvement projects that involve land disturbance, NPS will comply with the Virginia Erosion and Sediment Control Law, the Virginia Stormwater Management Law and other applicable federal non-point source pollution control mandates such as Section 313 \of the Clean Water Act and the federal consistency requirements of the Coastal Zone Management Act for those areas of the Park that are so designated. NPS will obtain appropriate permits before the initiation of any construction activities disturbing one or more acres of land. NPS will implement Best Management Practices, and the implementation of appropriate erosion and sediment control measures (GMP page, 154).

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6. Historic Structures and Archeological Resources

As management prescriptions are implemented in accordance with the GMP, NPS will coordinate and consult with the Department of Historic Resources, pursuant to Section 106 of the National Historic Preservation Act with regard \o specific proposals.

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#### **COMMENT • LETTERS**

Mr. Bob Kirby Page 7

vegetation, the Park Service should consider establishing woody vegetation provided it does not conflict with the historic interpretive use of the areas.

- 8. Forest and Tree Protection. According to the Department of Forestry, activities contemplated by the Plan will not give rise to significant adverse impacts on forest resources.
- Transportation. The Department of Transportation expects no negative transportation impacts from Plan implementation.
- 10. Local and Regional Comments. The Crater Planning District Commission reports that the Draft General Management Plan is consistent with the Commission's regional goals and objectives. The recommendations in the Plan will, if carried out, augment the civil war trail project in Dinwiddie County and the regional greenway and blueway efforts in which the Commission and the Friends of the Lower Appomattox River are involved.

The City of Petersburg's City Council adopted a resolution at its July 20, 2004 meeting which strongly endorses Alternative D. In the view of the City, Alternative D will enhance the Petersburg National Battlefield mission of protecting lands on which important Civil War battles were fought. It will extend the Battlefield's thematic interpretations to include the Civil War experiences of women and African-Americans through relevant landscapes and cityscapes.

#### Regulatory and Coordination Needs

- 1. Air Quality Regulation. As indicated above, open burning of debris may require a permit from DEQ. Similarly, any fuel-burning equipment used in construction or for other purposes may require air pollution control permits. Questions relating to these requirements may be addressed to DEQ's Piedmont Regional Office (James Kyle, Air Permits Manager, telephone 527-5047).
- Water Quality Regulation. The impacts of activities on wetlands and water quality are regulated by the Army Corps of Engineers through its Norfolk District, Regulatory Branch (Bob Hume, telephone (757) 441-7657) and by DEQ's Piedmont Regional Office (Curt Linderman, telephone (804) 527-5038).

In the event construction activities under the Plan should involve land disturbance of one or more acres, the Park Service would need a Virginia Pollutant Discharge Elimination System (VPDES) stormwater general permit for construction activities from DEQ's Piedmont Regional Office.

#### **RESPONSE • LETTERS**

Page 7-8. Forest and Tree Protection

NPS acknowledges that the Virginia Department of Forestry has determined that activities contemplated in the Plan will not have significant adverse impacts on forest resources.

Page 7-9. Transportation

NPS acknowledges that the Virginia Department of Transportation expects no negative impacts from the Plan implementation. If impacts of Park activities are expected to affect local roads, NPS will coordinate with the VDOT Richmond District Office.

Page 7-10. Local and Regional Comments

NPS appreciates that the Crater Planning District Commission reports that the Draft GMP/EIS is consistent with the Commission's regional goals and objectives.

#### **RESPONSE • LETTERS**

Mr. Bob Kirby Page 8

3. Erosion and Sediment Control; Stormwater Management. The Department of Conservation and Recreation encourages the Park Service to contact that Department's James Watershed Office (John McCutcheon, telephone 225-2992) and/or local erosion control and stormwater management authorities to obtain assistance in Erosion and Sediment Control Plan and Stormwater Management Plan development and implementation and to ensure that any project conforms with the applicable rules (Virginia Code section 10.1-567 for the Virginia Erosion and Sediment Control Law) and the Stormwater Management Law, (Virginia Code section 10.1-603.15).

4. Solid and Hazardous Waste Management. In the event of construction activities contemplated by the Plan, any soil that is suspected of contamination, or wastes that are generated, must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. These include, but are not limited to, the Virginia Waste Management Act (Virginia Code sections 10.1-1400 et seq.), the Virginia Solid Waste Management Regulations (9 VAC 20-60), and the Virginia Solid Waste Management Regulations (9 VAC 20-80); see the enclosed comments of DEQ's Waste Division (DEQ memo, Brockman to Ellis, dated June 22, 2004) for additional details.

We offer the following guidance on waste materials in the event structures are to be demolished pursuant to the Plan.

(a) Asbestos Abatement. Any structures to be demolished should be checked for asbestos-containing materials (ACM) and lead-based paints. If asbestos-containing materials are found, the Park Service must follow the rules for asbestos abatement in the Hazardous Waste Management Regulations, 9 VAC 20-60-261.

It is the responsibility of the owner or operator of a demolition or renovation project, prior to the commencement of the project, to thoroughly inspect the affected part of the facility for the presence of asbestos, including Category I and Category II nonfriable asbestos-containing material (ACM). Upon classification as friable or non-friable, all waste ACM must be disposed of in accordance with the <u>Virginia Solid Waste Management Regulations</u> (9 VAC 20-80-640), and transported in accordance with the Virginia regulations governing <u>Transportation of Hazardous Materials</u> (9 VAC 20-110-10 et seq.) The Park Service may contact the DEQ Waste Management Program (telephone (804) 698-4021) and the Department of Labor and Industry (Dr. Clarence Wheeling, telephone (804) 786-0574) for additional information.

(b) Lead-based Paint. Any proposed project must comply with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) regulations, and also with the <u>Virginia Lead-Based Paint Activities Rules and Regulations</u> (9 VAC 20-60-261). For additional information regarding these

Page 7-9 Regulatory and Coordination Needs

The NPS is committed to undertaking the coordination activities and complying with the regulations identified in the comments above and summarized in this section. The NPS also notes that as the GMP will be implemented over a twenty year period, when developing specific management prescriptions, the NPS will seek updated resource information, guidance on environmental management practices and will comply with the current regulations of the responsible state and local agencies.

**RESPONSE • LETTERS** 

Mr. Bob Kirby Page 9

requirements, the Park Service may contact the Department of Professional and Occupational Regulation (Thomas Perry, telephone (804) 367-8595).

5. Historic Structures and Archaeological Resources. Activities proposed in the Battlefield pursuant to the Plan must be coordinated with the Department of Historic Resources (also known as the State Historic Preservation Office) pursuant to section 106 of the National Historic Preservation Act, as amended. DEQ recommends that the Park Service consult with the Department of Historic Resources (Marc Holma, telephone 367-2323, extension 114) before undertaking any activities that may affect historic structures or archaeological resources.

6. Transportation. In the event the Park Service undertakes activities under the Plan that would affect local roads, the work should be coordinated with the Department of Transportation's Richmond District Office (telephone 524-6000).

#### Federal Consistency under the Coastal Zone Management Act

Pursuant to the Coastal Zone Management Act of 1972, as amended, the Park Service is required to determine the consistency of its activities affecting Virginia's coastal resources or coastal uses with the Virginia Coastal Resources Management Program (VCP) (see section 307(c)(1) of the Act and 15 CFR Part 930, sub-part C, section 930.34). This involves an analysis of the activities in light of the Enforceable Policies of the VCP (first enclosure), and submission of a consistency determination reflecting that analysis and committing the Park Service to comply with the Enforceable Policies. In addition, we invite your attention to the Advisory Policies of the VCP (second enclosure). The federal consistency determination may be provided as part of the documentation concluding the NEPA process, or independently, depending on the Park Service's preference. Section 930.39 gives content requirements for the consistency determination. Clarification of these comments may be obtained from this Office (Charles Ellis, telephone 698-4488).

Thank you for the opportunity to review the Draft Plan/EIS. We hope the foregoing comments are helpful to you in preparing the Final Plan/EIS and carrying out the Plan in the coming years.

Ellie L. Irons

Program Manager

Enclosures cc: (next page) Page 9 Federal Consistency Under the Coastal Zone Management Act

The NPS has determined that the proposals of the GMP are consistent with the Coastal Zone Management Program consisting of the nine enforceable policies of the Virginia Coastal Resources Management Program. A certification of consistency is being provided as part of the documentation concluding the NEPA process.

Board of Supervisors

Donald L. Haraway Chair Harrison A. Moody Vice-Chair



Robert L. Bowman, IV Doretha E. Moody Michael W. Stone

August 4, 2004

Mr. Bob Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, Virginia 23803

Dear Mr. Kirby:

I would like to thank you for taking time out of your busy schedules to meet with the Dinwiddie County Board of Supervisors and to brief us on the status and issues coupled with the General Management Plan (GMP). I found your presentation to be very enlightening, informative and inspiring.

As both a life-long resident of the Dinwiddie Community and Chairman of the Board of Supervisors, there are several basic fundamentals of the plan that I wish to speak on and lend my support. As you and I are aware, there is a vast opportunity for prosperous and sound Economic Development in Dinwiddie as there are more Civil War Battlefields here than any other single jurisdiction in the Country. The proven association between economic development and the tourism industry is vast and continuous. For Dinwiddie County to exploit our tourism potential, we must develop tourism infrastructure, tourism culture, and tourism marketing in a systematic and interlocking manner. With that said, I am pleased to inform you that the Board of Supervisors at their June 15, 2004 meeting authorized a letter supporting Alternative D of the GMP and we believe that once implemented will serve as a catalyst for this tourism success.

I am particularly pleased that Alternative D will expand the current audiences of the Petersburg Battlefield Park by broadening your interpretive themes to incorporate the "un-told" aspects of our nation's most divisive era. The untold story of the Civil War is vast; the actors were like you and I; the trials and triumphs are significant and relatable. I can think of no more fitting way to commemorate those that gave the supreme sacrifice than to honor and tell the story of those they were fighting for.

Finally, I am also pleased to learn that Alternative D of your GMP allows for greater preservation of nationally recognized Civil War Battlefields in Dinwiddie County. As you are familiar, Dinwiddie has some of the most pristine battlefields in the country. These battlefields and their ensuing protection are crucial for telling the story of the end of the Civil War. As Dinwiddie County continues to grow, these significant yet

NPS appreciates the endorsement of Alternative D by the Dinwiddie County Board of Supervisors.

# **RESPONSE • LETTERS**

unprotected battlefields are threatened and may fall victim to the demands and services that a growing and prosperous society necessitate.

These examples are only a few of the excellent aspects of Alternative D of the GMP. If there is anything that I can do personally or professionally to further assist you as you seek approval of this plan, please do not hesitate to contact me. I look forward to the day that we can work collectively with all the stakeholders to implement the valuable components outlined in Alternative D.

Sincerely,

Donald L. Haraway

Chairman

PETERSBURG NB



300 N. Main Street \* Ann M. Romano \* City Clerk \* (804) 541-2249 \* Fax (804) 541-aromano@ci.hopewell.va.us www.ci.hopewell.va.us info@ci.hopewell.va.us

July 14, 2004

Mr. Bob Kirby National Park Service HQ Supts. Office 1539 Hickory Hill Rd. Petersburg, VA 23803

RE: Petersburg National Battlefield General Management Plan

Dear Mr. Kirby:

A regular meeting of the Hopewell City Council was held on Tuesday, July 13, 2004. At that meeting City Council approved a resolution endorsing Alternative D for Petersburg National Battlefield General Management Plan.

A certified copy of the resolution is enclosed herewith.

Sincerely,

Ann M. Romano City Clerk

AMR/s

Enc. Resolution

D by the City of Hopewell City Council as adopted in a resolution at its July 13, 2004 meeting.

NPS appreciates the endorsement of Alternative

#### **RESPONSE • LETTERS**

#### RESOLUTION

A RESOLUTION OF THE COUNCIL OF THE CITY OF HOPEWELL, VIRGINIA, ENDORSING A PETERSBURG NATIONAL BATTLEFIELD GENERAL MANAGEMENT PLAN

WHEREAS, Representatives of the United States Department of Interior, National Parks Service, offered a presentation to the City Council at the meeting of Tuesday, June 8, 2004, which presentation outlined a proposal for the adoption of a General Management Plan for Petersburg National Battlefield Park: and

WHEREAS, Petersburg National Battlefield Park does not currently have a General Management Plan. The Park's existing Master Plan, adopted in 1965, was primarily a Facility Development Plan, and all of its major recommendations have been completed; and

WHEREAS, City Council was presented with four alternative versions of the General Management Plan, with alternative D being presenting as both the "environmentally preferred alternative" and the "park's preferred alternative;" and

WHEREAS, Alternative D for the Petersburg National Battlefield General Management Plan calls for the expansion of the park by 7,238 acres; the rehabilitation and repair of park resources; the expansion of park interpretive themes; the construction and upgrade of comfort stations in the park; the conversion of a currently unoccupied park building into a visitor contact station; the implementation of visitor touring plans which allow for tours to begin at any park unit; and the increase of park staffing levels; and

WHEREAS, the National Park Service has widely publicized the Draft General Management Plan and alternatives, and has solicited public participation in the consideration and proposed adoption of such a plan; and

WHEREAS, Petersburg National Battlefield Park is a valuable asset to the Tri-Cities, and the City of Hopewell has a vested interest in the improvement, expansion, and proper management and maintenance of the Park; and

WHEREAS, City Council is desirous of endorsing alternative D for the Petersburg National Battlefield General Management Plan.

NOW, THEREFORE BE IT RESOLVED by the Council of the City of Hopewell, Virginia, that the Council endorses alternative D for the Petersburg National Battlefield General Management Plan, and directs the Clerk of Council to send attested copies of this resolution to the Secretary of the Interior, to Senators George Allen and John Warner, to Congressman J. Randy Forbes, and to Bob Kirby, Superintendent, Petersburg National Battlefield Park.

#### -00000-

I, Ann M. Romano, City Clerk of the City of Hopewell, Virginia, do certify that the foregoing is a true and correct copy of a Resolution adopted by the City Council at their meeting dated July 13, 2004.

Given under my hand and the Corporate Seal of the City of Hopewell, Virginia, this 14th day of July, 2004.

SEAL

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City of Petersburg

Office of the Mayor City Hall Room 210 Petersburg, Virginia 23803

July 26, 2004

J. Robert Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, VA 23803

Re: General Management Plan

Dear Mr. Kirby:

Attached herewith is a Resolution adopted by the Petersburg City Council at its regular meeting on July 20, 2004, strongly endorsing Alternative D of the draft General Management Plan for Petersburg National Battlefield. The implementation of Alternative D will enhance greatly PNB's missions of preserving important battlefields and of providing the general public greater appreciation and knowledge of the Civil War by extending thematic interpretations to audiences heretofore not necessarily enamored of this conflict.

We appreciate your diligence and sensitivity in overseeing the preparation of the draft GMP and particularly your efforts to encourage and involve our citizens in its development. As you are aware, some of the City's residents are extremely interested in the June 9, 1864, battle of Petersburg. I would encourage you to develop and incorporate this event in your interpretation programs, as you have indicated you would during the public discussions regarding the draft GMP.

We appreciate your efforts to work with the City, as well as other localities in the region, to promote the many attractions available here for tourists and visitors. We look forward to working with you and the National Park Service to develop the partnerships that will enable the City and PNB to take full advantage of our extraordinary historical, cultural, and natural resources.

Cordially

Annie M. Mickens

Mayor

B. David Canada, City Manager

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NPS appreciates the endorsement of Alternative D by the Petersburg City Council as adopted in a resolution at its July 20, 2004 meeting.

# RESOLUTION RECOMMENDING SUPPORT OF ONE OF THE KEY ALTERNATIVES OF THE PETERSBURG NATIONAL BATTLEFIELD'S DRAFT GENERAL MANAGEMENT PLAN.

WHEREAS, the Petersburg National Battlefield was created in order to commemorate the campaign and siege and defense of Petersburg, Virginia, in 1864; and

WHEREAS, the Staff of the Petersburg National Battlefield is committed to preserving the historical, cultural, and natural resources within the Park in a manner that will provide interpretation, education, and enjoyment for visitors; and

WHEREAS, the Petersburg National Battlefield has served and continues to serve as a major tourist attraction in the Petersburg area, integrally related to the tourism programs of surrounding localities; and

WHEREAS, nearly one fourth of the entire Civil War was fought in and around the Petersburg area; and

WHEREAS, the Petersburg National Battlefield's General Management Plan will serve as a guide for the Park's basic approaches to natural and cultural resource management, interpretation, visitor experience, and partnerships for the next twenty years; and

WHEREAS, "Alternative D" of the current Draft General Management Plan will enhance the Petersburg National Battlefield's mission by protecting thousands of acres of currently unprotected land on which important battles were fought; and

WHEREAS, "Alternative D" will extend the themes interpreted by the Petersburg National Battlefield to include the experiences of women and African Americans in the Petersburg region and the causes and aftermath of the Civil War, and will utilize the landscapes and cityscapes of the region to tell the stories; and

WHEREAS, the partnership between the City of Petersburg and the Petersburg National Battlefield, called for in "Alternative D," will result in the establishment of a fifth unit of the Petersburg National Battlefield, initially called "The Homefront," with a new visitor center / contact station / interpretive center in Old Town Petersburg; and

WHEREAS, "Alternative D" is fully consistent with both the park service's mission and the goals of the City of Petersburg; now

NOW, THEREFORE, BE IT RESOLVED, by the City Council of the City of Petersburg, that the it hereby emphatically endorses the Petersburg National Battlefield's preferred "Alternative D" of the Draft General Management Plan, dated March 2004, as presented by Bob Kirby, Superintendent of the Petersburg National Battlefield, to the City Council on June 1, 2004, and the Petersburg public on June 28, 2004.

Clerk

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BOARD OF SUPERVISORS
Robert E. Forehand, Jr.
Joseph A. Leming, M. D.
Henry D. Parker, Jr.
William A. Robertson, Jr.
Jerry J. Skalsky

July 14, 2004

Mr. Bob Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, VA 23803-4721

Dear Mr. Kirby:

REF.: A3815

Prince George County is proud to be associated with the Petersburg National Battlefield. With the main unit at the northern boundary of our County, the Battlefield has served as a buffer between us and the urbanization of neighboring localities. From its historic origin, the Battlefield spawned what is now Fort Lee Military Base, which adds greatly to our area's economy.

In addition to other significant events, the Battlefield represents the longest siege of the American Civil War and featured the most prominent personalities of that War. The Battlefield has immensely enriched our heritage and has attracted tourists from around the world, adding much to local commerce and economy.

Through your efforts, Mr. Kirby, we have learned that the Battlefield has under study at this time, a general management plan with the potential to significantly enhance the attributes of out locality, and of course, Petersburg National Battlefield. After careful consideration of the proposals, the Prince George Board of Supervisors recommends the adoption and implementation of Plan D.

Jerry J. Skalsky Chairman, Board of Supervisors

c: Members, Board of Supervisors Ms. Brenda G. Garton NPS appreciates the endorsement of Alternative D by the Prince George County Board of Supervisors.

Department of Planning & Community Development 804-733-2308

Room 304, City Hall
Petersburg, Virginia 23803

July 28, 2004

FAX 863-2772
TDD 733-8003

Mr. Bob Kirby, Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, VA 23803

Re: Petersburg National Battlefield Draft General Management Plan

Dear Mr. Kirby,

I am writing to express my strong support of Alternative D of the draft General Management Plan for the Petersburg National Battlefield. This alternative offers numerous positive benefits for both the battlefield and our region. With the acquisition of an additional 7,238 acres of land, the park will be able to protect valuable cultural resources, provide an enhanced interpretation of the Civil War events in Petersburg, and expand areas for passive

As the City of Petersburg's Historic Preservation Planner, it is especially exciting that there is proposal for the battlefield to have a presence in our Old Town area. A visitor contact station and wayside exhibits within the downtown will be a great stimulus for tourism and to bring all aspects of Civil War events in our area together. Not only will this aspect of the plan enrich the visitors' experience of the battlefield, it will allow them to experience Petersburg and the surrounding areas. I often run at the Eastern Front, and on weekends see dozens of out-of-state cars. Tourists to the battlefield will greatly appreciate a comprehensive tour of our region.

As well, Alternative D creates regional connections and will benefit the local economies. While the plan states that new facilities could cause minor positive impacts to local economies, I believe, with the right promotion of all the units of the battlefield, tourism will greatly expand, and the economic benefits will be significant.

Thank you for the opportunity to comment on the draft General Management Plan for the Petersburg National Battlefield. If I can be of assistance, please do not hesitate to contact me.

Sincerely,

Victoria A. Hauser Preservation Planner

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Thank you for your comments.



#### Office of Economic Development

400 E. Washington St. Petersburg, Virginia 23803 phone 804.733.2352 fax 804.733,1276

Vandy V. Jones, III Manager



August 6, 2004

Bob Kirby, Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, VA 23803

Dear Mr. Kirby:

As a resident of Petersburg and the Revitalization Administrator for the City, I am extremely pleased that the National Park Service has developed a plan for the future investment in Petersburg. I am extremely encouraged by Alternative D in the Draft General Management Plan. It effectively maximizes the opportunity of the area-resident and visitor alike, to experience the magnitude of what is known as The Siege of Petersburg. Upon examination of all alternatives, Alternative D is the most logical in that it achieves—among many benefits, the following interpretive opportunities:

- The preservation of key battlefield land to maximize the ability to more fully "tell the story" of the Siege of Petersburg.
- The understanding of why the Siege of Petersburg occurred and the impact of
  the event on a besieged city by the creation of a fifth Petersburg National Battlefield unit
  and contact station in downtown Petersburg to explore all of the ramifications of the
  themes of the War.
- The ultimate opportunity—and historical necessity—to expand the knowledge of the Civil War—the events that led up to it, its conduct and its aftermath; and the resulting, broad implications that have shaped the country.

It is my belief that all educated parties to the future of the Petersburg National Battlefield fully understand the need for a solid, interpretive experience throughout the region with a primary facility being located within the authentic fabric—indeed within the city under siege, itself. Understanding the public need to experience the "full story" of the Siege, the logical introduction point within the epicenter of the City of Petersburg affords the visitor the ability to put the regional relationships within an accurate context. These visitors can see the "who, what, when, and why" and subsequently experience the many "where's" that took place during this period.

My one concern is the reference of the City of Petersburg as "The Home Front." This moniker should possibly be reviewed and reconsidered relative to focus-group insight of what the term "homefront" represents to the public. Traditionally, "the home front" is not the sight of a siege; it is the supply sight for those under siege. Simply put, if offers a strong air of confusion.

Thank you for the opportunity to express my thoughts. I look forward to a productive and successfully future for the Petersburg National Battlefield.

Sincerel

Revitalization Administrator

CITY OF PETERSBURG Petersburg, Virginia 23803 www.petersburg-va.com

The naming of the "Home Front" as a proposed designation for the new management unit has been carefully analyzed by park staff. To cover all the themes proposed in the GMP, park staff felt this was an appropriate name to carry out this comprehensive tasking. According to The American Heritage Dictionary of the English Language (2000), HOME FRONT means: "The civilian population or civilian activities of a country at war." Park staff analyzed other proposed names, such as "The Besieged City" or "The City Besieged." and felt these and others would not adequately encompass all of the themes that might be covered and some actually would have excluded them. Themes in Old Town Petersburg will cover at least a thirty-year time span from 1850 – 1880, rather than just a nine and one half month period implied by "The Besieged City." Understandably, from the point-of-view of the city's Tourism Department, an appealing label is important to attract visitors to the proposed partnership visitor contact station. But, until a more suitable label is identified, "The Home Front" is the most inclusive for the park's administrative needs. When coupled with the new Petersburg Campaign designations of "The Eastern Front," and "The Western Front," there should be no misunderstanding by the visitors as to what "The Home Front's" story will be all about. Park staff are not opposed to finding a better label but as yet, feel "The Home Front" serves that purpose most adequately.

#### **RESPONSE • LETTERS**

# Industrial Development Authority of the City of Petersburg

400 East Washington Street Petersburg, Virginia 23803 Phone: 804-733-2352

July 27, 2004

J. Robert Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, Virginia 23803

Re: General Management Plan

Dear Mr. Kirby:

The Industrial Development Authority of the City of Petersburg, Virginia wishes to express its support of "Alternative D" of the Petersburg National Battlefield's Draft General Management Plan.

It is our belief that "Alternative D" best fulfills the Petersburg National Battlefield's mission and the goals of the City of Petersburg.

We appreciate your efforts to work with the City, as well as other localities in the region, to promote the many attractions available here for tourists and visitors.

Cordially,

Wilbert M. Bland, Sr. Vice-Chairman Thank you for your comments.

#### **RESPONSE • LETTERS**

Thank you for your comments.

#### NATIONAL PARKS CONSERVATION ASSOCIATION

Protecting Parks for Future Generations

August 6, 2004

Superintendent Bob Kirby Petersburg National Battlefield 1539 Hickory Hill Road Petersburg VA 23803-4721 via email: pete gmp@nps.gov

Dear Supt. Kirby:

Thank you for the opportunity to comment on the draft Petersburg National Battlefield General Management Plan. I am writing on behalf of the more than 300,000 members of the National Parks Conservation (NPCA), a nonpartisan, national nonprofit organization dedicated solely to advocacy on behalf of America's national parks. NPCA strongly supports proposals to expand the park's boundary by at least 7,238 acres, and to expand its interpretive themes, especially the proposed inclusion of more information about the roles of African Americans and of women in the Petersburg Campaign, and in the siege and defense of Petersburg.

Of all the alternatives presented, Alternative D would best serve the mission and goals of the park as you move forward. Not only does Alternative D envision the expanded boundary, it also proposes to make the stories of Petersburg more accessible to the visitor, at many more points throughout the park. Because approximately 25 miles (as the eagle flies) separate Grant's headquarters at City Point from Five Forks battlefield, providing several places where visitors can orient themselves will provide a richer experience for them.

The boundary expansion is of fundamental and urgent importance to the park's future. In 1993, at the request of the US Congress, the Civil War Sites Advisory Commission reported that 23,000 of the more than 100,000 acres of lands associated with the Petersburg campaign retained their integrity. In the decade since, some of these lands have been lost to suburban, commercial and industrial development, and development pressures are escalating. Development pressures as intense as those now faced by Manassas, Fredericksburg, and Harpers Ferry are only a few years away for Petersburg. Now is the time to act to protect as much as possible of the historic lands that remain, in order to enable this and future generations to learn the many lessons that the living classrooms at Petersburg have to teach.

This boundary expansion goal of 7,238 acres is reasonable, even conservative, given that it represents a subset of remaining unprotected lands related to the campaign. If anything, we encourage the National Park Service to ask whether this proposal would adequately protect potentially rich archeological sites at Point of Rocks, and the route of Confederate retreat along



1300 19<sup>th</sup> Street, N.W., Washington, D.C. 20036
Telephone (202) 223-NPCA (6722) • Fax (202) 659-0650

6 PRINTED ON RECYCLED PAPER

August 6, 2004, Page 2

Intense and appropriate concern about the National Park Service's critical and chronic operational and maintenance funding shortfalls leads some to question whether the system should consider park expansions at this time. However, we can't afford not to make the investments necessary to protect this priceless national treasure, and to ensure its ability to communicate its stories and their meanings for generations to come.

An expanded park with enhanced interpretation and visitor services will benefit the region by attracting more, and more diverse, visitors to the park. And while photographs, brochures, films, and other media are useful tools for educating the public about the stories and significance of Petersburg, nothing compares to the impact on a visitor from moving through the landscapes of history, being able to imagine historic events without having to imagine away modern intrusions.

We urge members of Congress and other officials to support legislation to expand the boundary, and to provide funding to enable the Park Service to protect lands inside the expanded boundary for park purposes, as soon as possible. The integrity of the land will only diminish, and the cost of protecting it will only increase, with the passage of time.

Thank you for the opportunity to comment. Please continue to keep us informed as this plan is further developed.

Sincerely,

Joy M. Oakes Mid-Atlantic Regional Director 1300 19th ST NW, Suite 300 Washington, DC 20036 202-454-3386



1300 19th ST NW, Suite 300, Washington, D.C. 20036 Telephone (202) 223-NPCA (6722) • Fax (202) 659-0650

#### **RESPONSE • LETTERS**



Mr. Robert Kirby Superintendent, Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, VA 23803

June 30, 2004

Dear Bob,

Thank you for the opportunity to attend your briefing session at Eastside Community Center in Dinwiddie County on June 29. Like the rest of the public involvement process associated with the National Battlefield's General Management Plan, this meeting was informative and well managed.

Pamplin Historical Park and the National Museum of the Civil War Soldier considers itself a partner with Petersburg National Battlefield as the National Park Service crafts a blueprint for the future of Civil War history preservation and education in our area. We strongly support Alternative D, which promises to both protect and interpret the maximum amount of historic property in the Petersburg area. The story of the Petersburg campaign and its impact on the armies, the local citizens, and the nation at large is enormous, and it requires a commensurate commitment on the part of the National Park Service and others to meet the challenge. The opportunity exists to transform the Petersburg area from an afterthought to the "epicenter" of Civil War history interpretation in Virginia. Alternative D offers the best vision of realizing that opportunity.

We also appreciate the wording used to describe the significance of the Battle of Five Forks in your new plan, stating that the battle "put into motion the events" which led to the end of the campaign, the capture of Petersburg and Richmond, and the eventual surrender of the Army of Northern Virginia. This wording properly recognizes the

6125 Boydton Plank Road . Petersburg, Virginia 23803 . Phone (804) 861-2408 . Fax (804) 861-2820 . www.pamplinpark.org

A private, non-profit organization dedicated to historic preservation and public education

NPS acknowledges your concern that we mistakenly identified Pamplin Historical Park as an "incorporated" entity under the List of Recipients section on page 189 in the Draft GMP/EIS. A correction was made in the Final GMP/EIS so that Pamplin Historical Park, Inc. will be identified merely as "Pamplin Historical Park."



centrality of the decisive military actions on April 2, which were the immediate cause of the Confederate, defeat at Petersburg—an action that took place substantially on what is now Pamplin Historical Park.

We also support expanding the themes that the National Battlefield plans to explore. This is the approach that we have always taken at Pamplin Historical Park and we are delighted that the National Park Service now sees the need to place the military events that occurred around Petersburg into a larger context for visitors. Your plan to expand interpretive facilities in Dinwiddie County is particularly welcome news to us. We see the National Park Service, Pamplin Historical Park, and others working in tandem to develop an unparalleled learning experience for visitors to our area, and Alternative D at last allows the National Park Service to play its part.

My only quibble with the General Management Plan (beyond its enormous cost to the taxpayers to produce) is on page 189 of the draft where you identify Pamplin Historical Park, Inc. as an entity. We are not incorporated but rather a part of the Pamplin Foundation, a non-profit entity.

I look forward to the conclusion of this interminable General Management process, which, if Alternative D is approved, might well be worth the time and effort you and your fine staff have invested in it.

Sincerely,

A. Wilson Greene Executive Director

#### **RESPONSE • LETTERS**

Cilizens for a Beller Dinwiddie P.O. Box 3101

> Petersburg, VA 23805 804-733-5488

Bob Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, Va. 23803 August 4, 2004

Dear Mr. Kirby;

Citizens for a Better Dinwiddie would like to thank the Petersburg National Park Service for allowing us to comment on the Draft General Management Plan Draft/Environmental Impact Statement of March 2004.

Alternative A—It is understood that the United States Government requires that there be a no actions alternative.

Alternative B—It is understood that 7,238 acres is proposed for boundary expansion. On page 23 of the GMP, our primary concern is with the following battlefields listed: Boydton Plank Road October 27 & 28, 1864, Hatchers Run February 5-7, 1865, Peeble's Farm September 30 through October 2, 1864, Petersburg- The Breakthrough April 2, 1865. After numerous site tours by various organizations it is clear that there exists on the line of earthworks, known as the Hatcher Run Line, a high degree of integrity in the existing landscape.

Alternative C – This alternative seems to have left out the Hatcher Run earthworks except for the section that is owned by Pamplin Historical Park. Most importantly, a section of this line, owned by Ms. Gloria Jones, does not seem to have been in your review of the April 2, 1865 battlefields. Citizens for a Better Dinwiddie is concerned about a proposed highway, quarry, gas line, and high-

For Alternative C, the proposed boundary expansion of 2,030 acres is limited to only those lands that protect existing park resources. Since Hatcher's Run's battlefield is not currently within the park's boundary, it was not included with this alternative.

The process for determining the epicenters for

Alternatives B, C and D is detailed on pages 21-36 in the Draft GMP/EIS. The Jones, Zitta, Ragsdale and Patten properties are located outside the boundary established by the park through historical maps and professional scholarship. Under "Common to All Action Alternatives" in Chapter 2, park staff encourage private landowners to pursue other mechanisms, such as preservation easements, to protect the historic resources contained on their properties. Should the environmentally preferred alternative, "Alternative D" ultimately be chosen, those lands identified in the Final GMP/EIS will be vigorously defended against adverse actions upon them. Park staff objected in writing to the "S Alternative" of the Southeast High-Speed Rail, Draft Tier I, Environmental Impact Statement proposal that would intrude upon the lands where the Battle of Hatchers Run and the Picket Line Attack were fought. Park staff will continue to object to other potential adverse impacts to all

lands identified for protection in the Final

GMP/EIS.

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Alternative D— Preferred by the Petersburg National Battlefield, this alternative uses the cultural landscape as the mechanism by which the Civil War stories are told and will expand the boundaries by 7,238 acres. Again, our primary concern is why the Jones, Zitta, Ragsdale, and Patten properties were not included in the boundary expansion. The "epicenters" that are located on the above mentioned properties include pristine earthworks and gun batteries, dams built by the Confederate Army, and areas where the U.S. Colored Troops fought. Are these areas going to be protected in Alternative D?

To summarize, Citizens for a Better Dinwiddie feel that additional research needs to be done in the areas of Class A battlefields so that highways, a high-speed rail system, a gas transmission pipeline, and a quarry are not allowed to be placed on these battlefields.

Respectfully Submitted

Were Daufse august 4,200x

Geri Barefoot, Vice President Citizens for a Better Dinwiddie

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#### Pismal Swamp Rangers Co. A, 3rd Birginis Regiment C. S. A. Portsmouth, Virginia

July 30, 2004

Mr. Bob Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, Virginia 23803-4721

Dear Superintendent Kirby,

This letter is our organization's response to your invitation for public input into the *Draft General Management Planning at Petersburg*. We have been following your progress in this area over the past few years and would like to specifically request your consideration on a couple of issues. Thank you for the opportunity to present our observations.

By way of introduction, the Dismal Swamp Rangers is a member unit of the North-South Skirmish Association (N-SSA). The N-SSA is a non-profit organization dedicated to preserving the memory of *all* those who fought in the American Civil War by way of promoting marksmanship competition using weaponry representative of the American military during the war years of 1861-65. Each member organization in the N-SSA is a "reactivated" Civil War unit and the competitions take place with participants dressed in Civil War era uniforms. Our members, along with many others sharing similar interests, have been a vital part of our National Park's audience for many years and are among those who have supported park and battlefield preservation efforts past and present. In addition, many in our diverse membership are descended from those on both sides of our epic American conflict who fought and died on lands that are under your management at the Petersburg National Battlefield.

We would like to join those both locally and nationally who have voiced support for including the first attack on the City of Petersburg, 9 June 1864, into your storyline at the Petersburg National Battlefield Park. The courageous action taken on this day by the "old men and boys" of the city in repelling the attacks of a numerically superior foe marks the beginning of the siege of Petersburg and is a most fitting starting point for any interpretation of the campaign. This event is contained in all of the substantial literary works on the Petersburg campaign should be included in your interpretive program. We also recognize the logic presented the 10<sup>th</sup> Mass. Battery, another member unit of the N-SSA, as follows: "...it set the stage for the siege that followed, much like Buford's Cavalry at McPherson's Ridge set up the Battle of Gettysburg." Douglas Southall Freeman called this battle "... possibly the unique battle of the entire war."

In summary, we feel that if this story is left out of a future park movie on the scope of the Petersburg

#### **RESPONSE • LETTERS**

The park recognizes the significance of the battle of Old Men and Young Boys on June 9, 1864 in relation to the siege of Petersburg, Virginia during the Civil War. The story associated with this battle will most assuredly be part of the interpretative offerings provide to the public by Petersburg National Battlefield. The Draft GMP/EIS is not intended to provide information on all the battles or stories that might be considered in the future. When the Final GMP/EIS is approved, the park's Long Range Interpretive Plan will be revised to include expanded themes, new stories and potential sites. A brief description of the battle has been added to the Final GMP/EIS in Chapter one, A Brief History of Petersburg.

The 257 acres adjoining Flank and Defense Roads were transferred to the City of Petersburg in 1973. The NPS superintendent at the time felt that the existing trench lines and environs had lost their historic integrity as a result of encroachments by single family homes and businesses. Congress agreed with the superintendent and passed legislation to permit the divestiture. As a covenant to the transfer of title, the City of Petersburg agreed to take on the responsibility for the care and maintenance of the greenways and roadways and that they would..... "maintain the earthworks, fortification, and park-like character of the lands to be transferred." The NPS will not seek to re-acquire these lands. The issue of integrity of the resources, the basis of the original divestiture, is more valid than ever. The park has provided technical assistance to the City on several occasions for the management of these lands and will continue to do so in the future.

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campaign or not included in the park's interpretation relative to daily programs, a vital element in the social fabric of the time and the military events would leave a visitor with an incomplete understanding of what took place here between June 1864 and April 1865.

We would like to make mention of a second concern, and that in association with the recommendations provided you by10<sup>th</sup> Massachusetts Battery, we encourage the NPS to include a "strategy" in your final *General Management Plan* for the preservation of former National Park lands in Petersburg referred to as Flank and Defense Roads. It was intended that this property be preserved for future generations, yet it now lies outside of the protections guaranteed by NPS ownership. All is not lost, however. There are many preservationist groups and interested individuals across the country that would be willing to work with the NPS to insure that this land be better protected. Your support and documentation coupled with our honest efforts in support of NPS can help insure successful preservation of this land.

Thank you for your efforts to preserve the history of the Siege of Petersburg, we appreciate it! You will note that we have furnished a copy of this letter to our representatives that they might also have benefit of our input and our expression of support for your honorable efforts in working with and for the public to create the best Petersburg National Battlefield Park possible.

Sincerely yours,
Dismal Swamp Rangers
Co. A 3<sup>rd</sup> Va.
North South Skirmish Association

By: Wayne N. Trout, Adjutant 342 Dorwin Drive Norfolk, VA 23502-5708

CC:

Senator George Allen 222 Central Park Ave. Suite 120 Virginia Beach, VA 23462

Congressman J. Randy Forbes 2903 Boulevard, Suite B Chesapeake, VA 23322

Senator John Warner 4900 World Trade Center Norfolk, Virginia 23510

#### **RESPONSE • LETTERS**

Thank you for your comments.

Listoric Hope<sub>H</sub> Museums & Gift Shops Foundation Historic Hopewell \_\_\_\_\_\_Foundation Incorporated

Weston Manor House Museum
 City Point Early History Museum at St. Dennis Chapel
 Dr. Peter Eppes House

July 19, 2004

Mr. Bob Kirby, Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, VA 23803

Dear Mr. Kirby:

Congratulations on a well articulated and presented General Management Plan for the ongoing operation of the Petersburg National Battlefield. There is much work to be done and we commend you and others with the National Park Service for taking on this expansive and forward thinking project.

The Historic Hopewell Foundation, Inc. has reviewed the Plan and is most impressed with Alternatives C and D. We are interested not only in the City Point Unit in Hopewell, but the entire Petersburg National Battlefield. With regard to the City Point Unit, it was gratifying to note the proposed rehabilitation of Appomattox Manor as an historic house museum and Bonacord as a visitor contact center.

We would like to recommend adoption of either Alternative C or D. They both exemplify a preservation of existing park resources and provide additional facilities for visitor interpretation and education.

If Historic Hopewell Foundation, Inc. may be of any service to you, please let me know.

Cim coroler

Jane McCullen President

Historic Hopewell Foundation, Inc.

The Honorable John Warner The Honorable George Allen Honorary Trustees
The Honorable Henry L. Marsh
The Honorable Elmon Gray
The Honorable Riley Ingram

The Honorable C. Hardaway Marks The Honorable Robert Daniel

Post Office Box 851 • Hopewell, Virginia 23860 • 804 458-4682

July 16, 2004

Mr. Bob Kirby Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, Virginia 23803

Re: General Management Plan

Dear Mr. Kirby,

On behalf of the Historic Petersburg Foundation, I would like to thank you and your staff for the hours of hard work, which have obviously gone into the preparation of the new General Management Plan. Decisions made today will impact our city, its residents, and visitors for generations to come.

Naturally, we have an unwavering interest in your department doing what is most meaningful for the city Petersburg. I can only imagine how difficult it must be to remain true to history and at the same attempt to satisfy the competing interests of all communities that will be impacted by your decisions. First and foremost, history must guide your decisions. History is ours to preserve and document; not to tailor for its entertainment value.

The story of the "siege" must first of all be told accurately and the hallowed ground on which it was fought must be preserved wherever possible. Generations to come will be further and further removed from these events. It is incumbent upon us to insure that when the story is told, it depicts as nearly as possible, the experiences which are well documented.

A great number of our visitors are grandparents with their grandchildren. The story of the defense of our city by a cadre of "old men and boys" must somehow be interpreted. It is a tale that has endless possibilities to stir the emotions of all visitors, especially the very young and the very old. However inaccessible the ground on which it was fought may be, it is one of those stories that screams to be told.

The Historic Petersburg Foundation solidly supports option "D" in your proposal and strongly urges your efforts along with the city of Petersburg, to acquire the freight station in Old Towne to be used as the main interpretive center for the Siege of Petersburg experience.

Sincerely

Charles Du Ban

Charles J. DuBois President The park recognizes the significance of the battle of Old Men and Young Boys on June 9, 1864 in relation to the siege of Petersburg, Virginia during the Civil War. The story associated with this battle will most assuredly be part of the interpretative offerings provide to the public by Petersburg National Battlefield. The Draft GMP/EIS is not intended to provide information on all the battles or stories that might be considered in the future. When the Final GMP/EIS is approved, the park's Long Range Interpretive Plan will be revised to include expanded themes, new stories and potential sites. A brief description of the battle has been added in the Final GMP/EIS in Chapter one, A Brief History of Petersburg. Thank you for your comments.

#### **RESPONSE • LETTERS**



# The Old Brunswick Camp # 512 Sons of Confederate Veterans

P. O. Box 934 Lawrenceville, Virginia 23868

August 1, 2004

Bob Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, Virginia 23803-4721

Dear Superintendent Kirby,

The Old Brunswick Camp # 512, Sons of Confederate Veterans of Brunswick County, Virginia appreciates the good work of the National Park Service. Within your planning and associated work being conducted at Petersburg National Battlefield Park for today and for the future, we wish to thank you and the National Park Service for the opportunity to provide our membership's input into your extensive General Management Planning for the nation.

In this work at our National Battlefield Park, please help us to insure that a fairly rural significant battlefield area in Dinwiddie is one of your significant planning objectives within your GMP. The current conditions are not appropriate to the site. We looked at the Petersburg National Park, and what your plan covers. For a couple reasons we decided to focus on that portion of property which was the site of Fort Gregg. This portion of land is within your planning, its already owned by the Petersburg National Park Service, and is under your protection for the nation today.

Along with our community work in Southside Virginia, for many years now, we have enjoyed providing an educational opportunity to our Boy Scout and Cub Scouts Troops by at least yearly trips to our National Parks, and now with Pamplin Park we have provided for the "breakthrough" tour for last two years.

We hope that you are as concerned about the conditions at Fort Gregg, just off Boydton Plank Road, as we are. Although your maps are handy, in many cases we are sure that the site, not lacking in history and significance, is missed by many travelers not familiar with the area. The lack of signs, limited public access, and somewhat obscure NPS parking are all items that could be greatly improved upon. Again, this site is not lacking in significance and National value. For whatever reason, it has been disregarded in the past, and that is a shame! Hopefully it is on your "to be fixed list" within your objectives. Please know, you have our support for it's improvement.



In the Draft GMP/EIS on page 19, the NPS acknowledges there are significant problems at Petersburg National Battlefield in way-finding, access and signage, not just at Fort Gregg but at many other locations throughout the park. In Chapter Two, "Management Prescriptions Common to All Action Alternatives" on page 61, the park proposes a considerable amount of planning and coordinating with local jurisdictions and partners interested in a larger, regional signage endeavor to address this issue. The park will seek financial support for a Transportation Planning Study funded through the United States Department of Transportation, Federal Lands Highway Program to assist these endeavors.

#### **RESPONSE • LETTERS**





## The Old Brunswick Camp # 512 **Sons of Confederate Veterans**

P. O. Box 934 Lawrenceville, Virginia 23868

By past losses and current conditions, we feel our National Park in Southside Virginia is underfunded and under-represented. We are aware of the number of sites that you already manage, protect and represent though your work, but please take the necessary steps to insure this site at Fort Gregg is properly funded.

Because of the general nature of much of your planning data, we wish to provide this specific focused view on a National Park Service holding that is quite significant, and that does "cry out" for better attention and protection. This is not just a local view. Please fix the problems by calling attention to this matter through your efforts, and contact with our representatives. Thank you for your work, and please call our organization for any assistance we may be able to offer in your support of our park. Through a courtesy copy we have informed our representatives of this input.

Sincerely.

L. Tracy Clary, Commander The Old Brunswick Camp # 512 Sons of Confederate Veterans

PO Box 934

Lawrenceville, VA 23868

CC:

Congressman J. Randy Forbes 425 H. South Main Street Emporia, VA 23847

Senator John Warner 1003 First Union Bank Building 213 South Jefferson Street Roanoke, Virginia 24011

Senator George Allen 332 Cummings Street Suite C Abingdon, VA 24210

#### **RESPONSE • LETTERS**

PETERSBURG 2007 [Petersburg's Jamestown 2007 Steering Committee] PO BOX 2126 PETERSBURG, VIRGINIA 23804

June 28, 2004

Bob Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, Virginia 23803-4721

Dear Mr. Kirby:

This is in response to your letter to interested parties concerning the Draft General Management Plan (GMP) for the Petersburg National Battlefield (PNB).

First of all, we want to thank the PNB staff for all the hard work in putting together the Draft GMP. We have printed out a copy, have studied it carefully, and have made an evaluation. We have set forth some of our comments below. We do not consider these comments to be exhaustive, and we expect from time to time to submit further comments as the opportunity or need may arise.

#### COMMENTS. (Not in order of priority.)

- Overall effect. The Draft shows evidence of very hard work and difficult analysis. The
  visual illustrations are especially attractive. The work is very well organized and easy to
  read. The principal author should be commended for these aspects.
- 2. Summary. The Summary capsulizes the study in an orderly and well-written way. We especially appreciate the matter of your emphasizing the "reconciliation after the war...." We are all Americans first, Southerners and Northerners second. Partnerships should help reduce the load on the PNB. I am sure local educational institutions and local scholars will be glad to help you in your mission.
- 3. The Purpose and Need for Action. The impact of population changes is clear. Battlefields of the wars fought on our soil are being eaten up by growth of population. Although the history of Petersburg has some errors and omissions, the story is generally well written. We are disappointed that the "race for Petersburg" does not include the Battle of June 9, 1864, because this battle was clearly the first Federal attempt to capture the City, and although the battle was small in terms of numbers it has universal importance because it is the prime cause of the establishment of our National Memorial Day. It appears, with all due respect, the importance of our National Memorial Day's connection with Petersburg, and its contributing to reconciliation after the Civil War, does not seem to have been covered by the PNB. Recent, original research on the subject is now available and should help you study this important connection. Part of the reason for establishing PNB was to protect and interpret resources associated with the "... defense of Petersburg that occurred between June 1864 and April 1865." The siege was the main part of the battle for the City but not the only

The park recognizes the significance of the battle of Old Men and Young Boys on June 9, 1864 in relation to the siege of Petersburg, Virginia during the Civil War. The story associated with this battle will most assuredly be part of the interpretative offerings provide to the public by Petersburg National Battlefield. The Draft GMP/EIS is not intended to provide information on all the battles or stories that might be considered in the future. When the Final GMP/EIS is approved, the park's Long Range Interpretive Plan will be revised to include expanded themes, new stories and potential sites. A brief description of the battle has been added in the Final GMP/EIS in Chapter one, A Brief History of Petersburg. Park staff are telling that story of the June 9th Battle of Old Men and Young Boys and will continue to do so in the future. Traditionally, the Ladies Memorial Association of Petersburg has held its annual June 9th ceremony at Blandford Church and the park has been active in participating with it by providing at least seven speakers throughout the years. Park staff can provide you with a list of at least a dozen instances of Petersburg National Battlefield perpetuating the June 9th story including the publication of a full-length scholarly book on the battle (1989) with the maps being produced by our park historian.

part. The defending Southern forces who fought on June 9 were Americans too, and commemorating that battle is also within the purpose stated as "without the taint of bitterness or shame to either side...." The name changes to the battlefield sectors are satisfactory, but you might want to consider a more descriptive name for the City as the "Home Front." The idea of partnership with the City is a very generous thought, and we wish you success in your

- Management Alternatives. We like Alternative D the best of those presented.
- The Affected Environment. The environmental impact part of the Draft GMP is very well done. It is a thorough and thoughtful analysis and presentation of the facts.
- Environmental Consequences of Alternatives. This part of the Draft GMP is also very well done, and its author should be commended.
- Consultation & Coordination. This section is well-written and organized. We believe, however, the section on Scoping: Public Workshops needs fleshing out. Several of our Committee members were at these workshops, and the paragraphs describing them do not correspond fully with our experiences. For example, there were participants representing large groups of citizens (e.g., Historic Petersburg Foundation, Petersburg Area Art League) whose members had given their approved input to the organizations' leadership to be presented to the PNB. It is our understanding, the comments they made to the PNB representatives were taken as comments from one citizen rather than the sum of all the members represented. By putting the comments in that context, there is no priority-ranking of comments; i.e., their comments would appear to represent one view only and not the view approved by hundreds of citizens. Another example concerns the Battle of June 9, 1864 discussed above. We are sure there were hundreds of citizens represented who felt this battle should be covered more thoroughly by the PNB as the opening battle of the Petersburg Campaign, but this citizen input seems to have been overlooked in the outcome of the Draft. (We do know, there have been some attempts recently to add some coverage to that battle in your programs, especially by one of your staff who re-enacts some aspects of the battle for the public; and we do not want you to feel we do not appreciate those efforts. However, the citizen input does not appear fully in the Draft. We assume this is an oversight. We also understand there are some "turf" problems concerned with the June 9 battle vis-á-vis Richmond Battlefield.) You might want to consider re-visiting the laws covering such sites as Flank Road, and flesh out your discussion on issues concerned with that site.
- Appendices. The appendices were very useful in helping the understanding of the Draft GMP. There are some notable and useful references that were not included in the list, but the list is formidable nevertheless.
- Mans. The maps are outstanding and very useful.

All in all, we want to thank you for a job well done. We hope that you will consider our modest input and make it part of the next phase in finalizing the GMP. Please be assured of our cooperation.

As noted under the Scoping: Public Workshops section in Chapter 5, the summary of these meetings in the Draft GMP/EIS does not provide a full accounting of the many organizations that participated and spoke on behalf of their memberships. The NPS GMP Planning Team and park staff facilitated these workshops and considered in the evaluation of comments that many individuals and organizations advocated for greater representation of the June 9 battle.



## Petersburg Chamber of Commerce

325 East Washington Street • Post Office Box 928 • Petersburg, VA 23804 (804) 733-8131 • FAX (804) 733-9891

August 4, 2004

Mr. J. Robert Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, Virginia 23803

Dear Mr. Kirby:

The Petersburg Chamber of Commerce strongly endorses the Alternative D of the draft General Management Plan for Petersburg National Battlefield. This plan will enhance the preservation of important battlefields and also provide the public an appreciation and knowledge of the Civil War history.

We appreciate the preparation of the draft General Management Plan and the opportunities available for citizen input. We look forward to a continued association with you and the City of Petersburg to promote the many attractions available for our tourist and local citizenry.

Sincerely,

Ernest H. "Bud" Yerly, Jr.

President

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## Rotary Club of Petersburg, Virginia

"He Profits Most

Who Serves Best"

PETERSBURG, VA. 23805 June 28, 2004

Bob Kirby, Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, Virginia 23803

Dear Mr. Kirby:

We are pleased that the National Park Services has developed a plan for the future investment in Petersburg. Our organization, the Renaissance Committee of the Rotary Club of Petersburg, Virginia, has been working with city officials to develop a viable tourism program. We have assisted with providing tour maps. We made suggestions for signage concerning Civil War Trails and Underground Railroad Stations. We have suggested Kioshes to be placed in strategic areas. We have also volunteered to do research concerning the architecture of facilities and buildings in downtown Petersburg that were hit by bullets during the Siege.

We support Alternative D because our organization believes that it will portray the true history of this area before, during and after the Revolutionary and Civil Wars, and additionally, for the following reasons:

- 1. Preservation of key battlefield land ...
- The location of a fifth PNB unit and contact station in downtown Petersburg to explore all of the ramifications of the themes
- To expand the knowledge of the Civil War the events that led up to it, its
  conduct and its aftermath; and the resulting, broad implications that have shaped
  the country.

We hope that our views will be received in a favorable manner.

Germaine Fauntleroy

Chairperson, Renaissance Committee Rotary Club of Petersburg, Virginia Thank you for your comments.

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#### **COMMENT • LETTERS**

# SONS OF CONFEDERATE VETERANS Virginia Division Army of Northern Virginia

July 24, 2004

Bob Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, Virginia 23803-4721

Re: Petersburg National Battlefield Park

Dear Mr. Kirby:

This letter is in response to your interested parties listing on page 189 (in references to the Sons of Confederate Veterans {SCV}) of that portion of the National Park Service General Management plan that concerns the "Draft General Management Plan" (GMP), developed for the Petersburg National Battlefield (PNB). It is my understanding that a copy was mailed out to the SCV requesting input into this momentous plan. Although I have not been able to discover the SCV's copy this is not to say that it was not sent. However, I was able to review a copy.

Under Director's Orders # 2, Park Planning, it is noted that the National Park Service will actively seek out and consult with existing and potential visitors, neighbors, and people with traditional cultural ties to park lands.

In reply to the GMP, I would first like to commend and thank the PNB for their better than excellent work in putting together this comprehensive study and plan as well as allowing people with traditional cultural ties to offer input.

The four thousand members of the Sons of Confederate Veterans (SCV), and their extended families across the Commonwealth of Virginia, are regular visitors to the parks concerning the War Between the States and are understandably interested and concerned with the presentation and emphases placed on various aspects of this conflict. We are well aware that such emphases and presentations are a lasting impression for many years to come on all those visiting the parks from what ever walk of life, view point, interest or cultural ties they might represent. Subsequently, it is important to the SCV, and all the descending families of the Confederate nation, (and we are Legion), that a well-balanced representation be made.

The heroic "Alamo" type defense by the old men and boys of the City of Petersburg on June 9 of 1864, until help could arrive, has been given scarce attention by the GMP. This fight opened into several fronts which stopped the initial invader's attack and sets the stage for an almost continuous battle of ten more months. If it were not for the indomitable defense by this tiny force of Confederate Virginians, Kautz would have

#### **RESPONSE • LETTERS**

The park recognizes the significance of the battle of Old Men and Young Boys on June 9, 1864 in relation to the siege of Petersburg, Virginia during the Civil War. The story associated with this battle will most assuredly be part of the interpretative offerings provide to the public by Petersburg National Battlefield. The Draft GMP/EIS is not intended to provide information on all the battles or stories that might be considered in the future. When the Final GMP/EIS is approved, the park's Long Range Interpretive Plan will be revised to include expanded themes, new stories and potential sites. A brief description of the battle has been added in the Final GMP/EIS in Chapter one, A Brief History of Petersburg.

This defense well represents the pluck and determination of the people of Virginia, even unto this day, and should not be relegated to a few passing remarks as is the case under the Draft GMP at present. We implore you to do the right thing in emphases and presentation of these Confederate Virginians in the June 9<sup>th</sup>, 1864 battle in your GMP. We respectfully recommend Battery 5 and the Crater for the relating of this important historical event.

Darryl F. Starnes

Chief, Heritage Defense Sons of Confederate Veterans Virginia Division

CC:

US Senator, John Warner 225 Russell Senate Office Building Washington, DC 20510-4601

US Representative, Eric Cantor 309 Cannon House Office Building Washington, DC 20515-4667

Attorney General, Jerry Kilgore 900 E. Main Street Richmond, Virginia 23219

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#### **RESPONSE • LETTERS**

RECEIVED
AUG n 5 2004

PETERSBURG NB

Don Richard Lauter

Cultural Resources Consultant 1 1580 Continental Forest Drive Disputanta, Nirgi sia 23842 Phone/Fax (804) 862-3024

Prehistoric and historic site surveys. Restoration archaeology. Archival research. Historic architectural analysis. Battle reports and cartographic work with emphasis on Civil War maps.

Suprtintendent Mr. Bob Kirby Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, Virginia 23803-4721 August 5, 2004

Dear Superintendent Kirby,

I would like to take this opportunity to thank the National Park Gervice for their decision to allow community participation to relay information and concerns associated with the Petersburg National Battlefield Draft General Management Plan (GMP) / Environmental Impact Statement (ELG) of March 2004. On July 30, 2004 the Grater Battlefield celebrated its 140 anniversary where citizens from all over this nation were able to enjoy visiting a battlefield that retains much of its integrity, however there are quite a number of battlefield "epicenters" that are not being protected as called for by Congress in its Report on the Nations Civil War Battlefields in 1993. With the constant threat of commercial and industrial development there is an immediate need for a master plan and that it be accurate.

The process for determining the epicenters for Alternatives B, C and D is detailed on pages 21-36 in the Draft GMP/EIS. Much time and effort was put into the process by members of the park staff and others. With the Petersburg Campaign being fought over 176 square miles (100,000+ acres), park staff looked hard at what met NPS criteria for preservation. Numerous sites were looked at and evaluated for their integrity, interpretability and feasibility. Using the Congressionally appointed Civil War Sites Advisory Commission's (CWSAC) report as a starting point, park staff actually expanded the initial "core" and "study" areas to be more inclusive for each battlefield. Using current scholarship produced since that report and Geographic Information System (GIS) technology, park staff produced individual maps for each of the Class "A" and "B" designated battlefields. These maps were further analyzed and assessed in a park produced document (01/13/02) titled: "Petersburg National Battlefield, Land Protection Report, Assessment of Integrity." The park did consider including these detailed epicenter maps in the Draft GMP/EIS, but dismissed the idea because of increasing the size of the document and costs. These maps are available for review at the park. In 2002, park staff consulted with well-known and published historians William Glenn Robertson, Edwin C. Bearss, William C. Davis, Dr. Richard J. Sommers, Noah Andre Trudeau,

Petersburg and its environs are at a critical crossroads at this moment as atleast ten battlefields of national significance are being threatened by proposed highways, gas transmission pipelines, a high-speed rail system, and a quarry. Eleven years have now passed and the location of epicenters and the areas known as "blood stained ground" are still being disputed. These critical areas should have been documented at the Department of Historic Resources in Richmond, Virginia and of course on file at the Petersburg National Battlefield. Does it not seem strange that an interpreter of history, who has never set foot on some of these sites, is relied upon to choose what areas have integrity? Would it not be better to get a second opinion, after a site examination from authors such as Noah Andre Trudeau, John Horn, Dr. David Cross, Arthur W. Bergeron, Jr., Thomas, J. Howe, and Richard, J. Jommers?

Officials at the Petersburg National Battlefield prefer Alternative D The Landscapes Telt the Stories. As one of the provisions of public law 95-625, The National Park and Recreation Let of 1978 Congress directed that the National Park Service consider as part of a planning process what modifications of external boundaries might be necessary to carry out park purposes. Nowhere in the GMP are there topographical maps showing the exact locations of these critical "epicenters" and in some cases the maps are in direct conflict with the Civil War Battlefield Guide second edition published by the Conservation Fund. It is no wonder that there is conflict when a highway, quarry, or gas pipeline is projected to be built through the core areas of these battlefields, so as not to go through these "epicenters".

In brief: the questions concerning the "epicenters" with integrity on Class II and B battlefields have to be settled before any boundary expansion can be undertaken. The following list covers, in this writer's opinion, "epicenters" in dispute: the Shands House Battlefield, June 16 and 17, 1864 covering the capture of the Tennessee Brigade, Jerusalem Plank Road Battlefield the capture of Vermont troops, Hatcher Run Battlefield the site of Generals Leth and Evans attack against Generals Smith and Mott, and the location of Robert E. Lee's position in the Haicher Run earthworks that day. Also Petersburg-The Breakthrough April 2, 1865, the location of

Dr. Gary Gallagher, Dr. James I. Robertson, David W. Lowe (ABPP), and Dr. Steven Anders (Fort Lee) on matters related to historical accuracy. Having the Draft GMP/EIS posted on the park's web site has also allowed a national audience access to the document.

Should the environmentally preferred alternative, "Alternative D" ultimately be chosen, those lands we have identified in our plan will be vigorously defended against adverse actions upon them. Park staff objected in writing to the "S Alternative" of the Southeast High-Speed Rail, Draft Tier I, Environmental Impact Statement proposal that would intrude upon the lands where the Battle of Hatchers Run and the Picket Line Attack were fought. Park staff will continue to object to other potential adverse impacts to all lands identified for protection in the Final GMP/EIS.

#### **RESPONSE • LETTERS**

Doubleday, Woodward, U.S. Colored Troops, and the 8<sup>th</sup> and 41 USCT advance. On the same day the position of the 127<sup>th</sup> UDCT in front of Battery 45 and the position of the Norfolk Light Artillary Blues does not appear in the GMP. Most importantly the area around Burgess, Virginia has been designated as the site of the future fast train system for Virginia, is this not the site of General Mahone's counterattack and also one of the battlefield "epicenters" of April 2, 1865 Second Corps action?

I wish to thank you for this opportunity to relay these serious questions and hope that they will be considered in boundary expansion.

Respectfully submitted

D. R. Lauter

#### **RESPONSE • LETTERS**

G. Ashleigh Moody, III 218 High Street Petersburg, Virginia 23803

RECEIVED

AUG 0 6 2004

Superintendent Bob Kirby Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, Virginia 23803-4721

PETERSBURG NB

Dear Superintendent Kirby,

On behalf of my family and myself, I submit this letter in response to the opportunity provided for public input into the Draft General Management Planning at Petersburg. This is a follow-up to input provided over the past years during other such offerings within your planning, and I would like to specifically request your consideration on a couple specific associated issues addressed below. Thank you for the opportunity to present our input.

#### BACKGROUND:

Along with my family, I have been a strong supporter of our National Parks. Over the years, we have personally benefited by the spirit in which they are preserved, presented, and the information provided for us to enjoy and learn. Much of our lives today are associated with preservation of our American heritage through work in museum systems, historical preservation, and preservation within our community. I am proud to have two sons interested and active in such work today. In addition, we are directly descended from those who fought on both sides of a "not so civil war", and upon the lands that are under your management today at the Petersburg National Battlefield. We thank you for any of your contributions in association with their care.

This input is not sent with the ideal that we are standing in front of a bulldozer that is about to destroy our important historical attributes. We also recognize that former Petersburg National Park lands, along with other lands, were destroyed in the past by a lack of expert reasoning, and by just bad planning. As you know, in many cases, the results provided little to what anyone could call progress today. This letter is sent in response to a well-executed document that can influence better judgment under current law, better reasoning, better leadership, and better experts.

#### SPECIFICALY:

We wish to provide our public input on two issues that have been our focus during the period of your planning. In review of your draft planning for the future, the primary reason for this input is the magnitude scope, and far reaching changes to your mission being presented in your General Management Plan.

The park recognizes the significance of the battle of Old Men and Young Boys on June 9, 1864 in relation to the siege of Petersburg, Virginia during the Civil War. The story associated with this battle will most assuredly be part of the interpretative offerings provide to the public by Petersburg National Battlefield. The Draft GMP/EIS is not intended to provide information on all the battles or stories that might be considered in the future. When the Final GMP/EIS is approved, the park's Long Range Interpretive Plan will be revised to include expanded themes, new stories and potential sites. A brief description of the battle has been added in the Final GMP/EIS in Chapter one, A Brief History of Petersburg.

The 257 acres adjoining Flank and Defense Roads were transferred to the City of Petersburg in 1973. The NPS superintendent at the time felt that the existing trench lines and environs had lost their historic integrity as a result of encroachments by single family homes and businesses. Congress agreed with the superintendent and passed legislation to permit the divestiture. As a covenant to the transfer of title, the City of Petersburg agreed to take on the responsibility for the care

#### **RESPONSE • LETTERS**

1st. Preservation of Flank and Defense Roads, Petersburg, Virginia – Battlefield Attributes: A quote presented in your draft General Management Plan indicates, "Land Protected by Others," provides an interesting issue about this former Petersburg National Battlefield Park land that we have discussed. As you have indicated, we would both like that to be the case (Land Protected by Others)! As you also know, it has been quite difficult to enforce the Federal Public Law, which in earlier years → the Petersburg National Battlefield Park enabled in their past presentation to Congress, Congress passed, and the President of the United States signed. Today, there exists a very fragile ownership condition. Many citizens are, or upon discovery would be, concerned, or feel a broken trust within the system. Obviously this law was created to "protect this land unimpaired for future generations." All is not gloom and doom, and very little has been lost since this law was enacted.

As a concerned citizen, I do not want to hear unrecorded excuses, and see what <u>could</u> turn into a "fleecing of America" with an unwatchful eye. Upon final evaluation, all we would like to see a respectable combined effort and strategy within your planning to reflect an appropriate status and future for this "significant" land. As you know the public across the country have little knowledge of this issue here. This Federal Public Law for the people across this nation should not be polluted by any myopic local opinion without an opportunity for national input from those for which this land was protected and a law was enacted. What is suggested is a real documented "successful strategy" of protection under law since these lands are currently on your main tourist route within Petersburg.

2d. First Attack On Petersburg, Virginia, 9 June 1864 – Battlefield Expansion. Our family is proud to join with others in recommending and/or supporting your action to include this unequalled story into your program of what happened "at Petersburg" in 1864." In the past this story was told on the Petersburg battlefield in many ways, and at many times. This story has always been a part of the Petersburg battlefield tour.

On top of all of our discussions, and the variety of significant volume of input over the past three and a half years, we have been able to bring new information forward to this important day. Some conventional wisdom has been our past enemy, and facts have proven to be more reliable!

Since the Petersburg National Battlefield Park already owns and protects a large portion of the 9<sup>th</sup> of June battle site, and is in near proximity of where other action of this day took place, the notion of Battlefield land protection is not show stopping issue. Time and so-called "Progress" has not destroyed the entire battlefield where this battle took place, and has not erased the story with obvious national attributes. A primary site is Battery 5 under your management.

Based on past losses here in Petersburg, further expansion without appropriate funding is a major concern of ours in relation to this story and history. We know funding is central to your plans. We do not want to see what we consider to be "expansion and neglect of the core." As you know, Petersburg's past is central to the story.

Both recommendations above do not require any land acquisition, extra personnel, or special wheel. As an example, the NPS at Fredericksburg and vicinity does a nice job at their National Park in sharing their area story. The only attributes required in similar execution today are those

and maintenance of the greenways and roadways and that they would....."maintain the earthworks, fortification, and park-like character of the lands to be transferred." The NPS will not seek to re-acquire these lands. The issue of integrity of the resources, the basis of the original divestiture, is more valid than ever. The park has provided technical assistance to the City on several occasions for the management of these lands and will continue to do so. The park appreciates and applauds your interest in seeking to stabilize, preserve and interpret these remaining resources.

#### **RESPONSE • LETTERS**

that are already in place, or that should be in the future expansion. These are felt to be a desire, support of the law, and an execution of standard National Park Service policy.

We have provided our representatives a copy of this input in support of Petersburg National Battlefield Park, and the appropriate funding in support of your planning and action within.

Sincerely,

218 High Street

Petersburg, Virginia, 23803 (804) 732 5823, brickhouserun@aol.com

brickhouserun@aol.com

CC:

Senator George Allen Congressman J. Randy Forbes Senator John Warner

#### **RESPONSE • LETTERS**

DCP August 3, 2004

# COMMENTS ON THE PROPOSED GENERAL MANAGEMENT PLAN (GMP) CONCERNING EXPANSION OF THE PETERSBURG NATIONAL BATTLEFIELD

Dear Sir:

I was pleased to get a hard copy of your proposed GMP plan (draft March 2004) on battlefield expansion and have the opportunity to be able to review it and provide you comment. I want to congratulate your organization on the amount of work and effort that is apparent from the published GMP. It indicated a lot of information was gathered and considerable analysis done in order to produce the final document.

Let me provide you some information on myself so you will understand my viewpoint and where my comments are coming from. I am a recently retired federal employee (Washington DC area) who is quite similar with mission statements and evaluating contractor proposals. I am also a current member of the CWPT (Civil War Preservation Trust) and a recent participant of Virginia Tech's "Campaigning with Lee" seminar group. Finally, I am a frequent visitor to Civil War battlefield visitor centers and facilities.

With the information provided within the GMP document, I was able to identify some areas where I thought the GMP lacked some detail, or needed further clarification or explanation. Finally, I wanted to provide you my thoughts and also provide you some specific recommendations for your review and consideration.

- 1. COMMENT: On Program Expansion Alternatives. Alternative D best meets the defined mission statement objectives. Alternative A is a non-starter. From my perspective, Alternative D (not considering cost) is the best option for the proposed Petersburg Battlefield expansion and reflects similar advancements other Civil War Parks appear to be pursuing while preserving some cost containment for the expanded growth. This option: (a) best preserves the battlefields (returns them to the 1864/65 landscape look), maintains the earthworks, provides better controlled storage for relics; (2) expands the education/interpretation themes and experience; and (3) attempts to improve the visitor experience and park attendance. Even the total cost for Alternative option D is modest comparing it to the New National Underground Railroad Freedom Center in Cincinnati, Ohio (\$110 Million) or the pricey new National Slave Museum planned for Fredericksburg, Virginia. Media improvements can be added at a later date, perhaps at lower cost due to the constant advances in electronic technology. I would encourage you to pursue partnerships with other organizations to reduce the projected costs and to expedite the proposed acquisitions.
- 2. COMMENT: Concerns on battlefield land acquisition. Of prime importance to me is preserving endangered battlefields from development or destruction. Securing those additional and new battlefields as defined in the GMP is critical. It concerns me that appendix C indicates that total land acquisition (<u>purchase or easement</u>) time may be as long as 10-15 years. I do not believe the Park has that luxury of time. Additional time

The cost formulas for staffing were based on typical operational requirements to manage the park at the "full build-out" scenario. All dollar amounts, including land acquisition costs are in 2002 dollars. Those costs would be adjusted over time in accordance with rise (or fall) of the Consumer Price Index (CPI). Consequently, we did not attempt to project costs 10-15 years in advance. The costs are modest when you factor in the existing park operating budget (in 2002, \$2,236,000/yr). Alternatives B & D put more staff in the field for law enforcement, maintenance and interpretation and resource management, while Alternative C places staffing in visitor centers, museums and for technical assistance, but spends more on exhibit development, movies, furniture, etc. The full build-out scenario will take years to achieve and staffing will be added according to the rate of land acquisition, infrastructure development and inversely with the degree of success with partnerships. As you have noted, some staffing costs seem disproportionate. Even though Alternatives B & D seek to preserve the same number of acres of battlefields, what ultimately will occur under each alternative on each of those landscapes dictates the staffing levels applied. In other words, there will be minimal NPS staffing on the landscapes under Alternative B. Under this alternative, the park focuses on preserving battlefields and works with partners

A possible additional funding source to consider might be to request the Treasury Department to approve and mint a new commemorative coin(s) for national park and battlefield preservation. This could provide substantial funds, just like the current state quarter program.

Further, I would also recommend that a very detailed study be conducted on: (1) the amount of adequate land buffer for the expanded Park should <u>Fort Lee</u> disappear during the next Government BRAC; and (2) determining the plan for obtaining the needed land buffer should this premise occur. I would recommend the study be accomplished by a panel consisting of a mix of park personnel and outside battlefield experts and consultants.

3. COMMENT: On cost data and milestone schedule on battlefield expansion. I understand Appendix C presents a summary of programmatic cost data guesstimates (developed from standard cost formulas and other data) for the various proposed Park expansion alternatives. However, some costs such as additional staffing were substantial over the current manpower levels. Can you provide some additional detail or basis (assumptions) to justify these types of increases? It could help when defending the final Park expansion plan. I was in particular interested with the additional staffing, maintenance, and law enforcement costs per Program alternative.

Also what is the FY milestone chart for expansion activities including land acquisition, construction, and modernization activity and increased staffing? Have your future year maintenance and energy costs been estimated and are they in line with expected inflation? Has it been estimated as what the land acquisition costs might be 10 or 15 years from now? Finally, has it been determined when land acquisition costs become prohibitive should partnerships (such as CWPT) not be able to participate?

4. COMMENT: Central Visitor Center Concern. For a successful park experience, the central visitor center must be an adequate facility. This means it must be of size to handle a reasonable number of visitors and groups all at the same time. It also needs to be of a size to adequately: display interpretive exhibits and relics; provide parking, office space, visitor orientation, restroom spaces as well as provide additional educational information spaces (like a well stocked bookstore and appropriate lecture/media spaces). The GMP points to some current shortcomings of the present central visitor center including the site location. The assumption that the present central visitor center is adequate enough to do the required job as long as other expansion provisions are accomplished raises the question as when does the present visitor center (with time and use) become inadequate. I believe the central visitor center is a key to the success of the entire park. Would it be appropriate to consider a new central visitor center? Was there a specific cost study conducted on replacing, expanding, or modernizing the present central visitor center? If so, what were the details and results? The offsets from not doing other facility modifications might significantly reduce the replacement bill of the current visitor

to interpret and maintain them. Alternative B, could arguably rely more heavily on "preservation easements" with landowners and interpretative panels (wayside exhibits) for on site interpretation, while Alternative D may place more maintenance staff on land owned in Fee, more interpreters on site to provide talks and walks and a correspondingly higher degree of law enforcement coverage to protect visitors and federally owned resources.

The park anticipates working with a variety of partners to reduce development and land acquisition costs. Park staff have working relationships with notable land preservation organizations, including the Civil War Preservation Trust, The Conservation Fund, the National Park Foundation, Izaak Walton League and the Virginia Outdoors Foundation. Working together, considerable progress has been made in preserving nationally significant Civil War battlefields such as: Reams Station, White Oak Road, Hatchers Run, and Five Forks. Although, the NPS may never own all or most of these properties, working with partners helps ensure that these lands are preserved for the understanding and enjoyment of this and future generations.

center. Finally, construction at a much later date is certainly going to be very expensive. Expansion or modernization of the current facility might be a workable solution.

5. COMMENT: Additional Park Emphasis and Visitor Center Interpretive Themes:

I believe that as part of your Park improvement and expansion plans that three areas identified below might be most beneficial for the visitor experience and I believe would help improve park attendance.

A. <u>City Point</u> is a valuable historic place. Greater resources should be put on getting the visitor to visit there to understand how it supported the Petersburg Siege efforts and how it was a significant meeting place on determining war strategy. Alternative Option D offers some needed and overdue improvement.

- B. The Siege and War experience of the City of Petersburg. There have been successful joint ventures between the Fredericksburg and Spotsylvania National Military Park and the City of Fredericksburg on telling the war stories. Similar activities could work with the City of Petersburg. This should help develop increased public awareness that should foster better park attendance. Alternative Option D offers some needed and overdue support in this area.
- C. For your consideration, I would suggest three major historical interpretive themes for the central visitor center. First, telling the story of the Petersburg Siege and its surrounding battles (highlighting the expanded park areas) including presenting the contributions of the African-American troops during the siege. Second, explaining U.S. Grant's Overland and Petersburg campaign. Third, presenting the Civil war in general, identifying causes of the Civil War, the evolution to war, the African-American participation, the major war events, and detailing the consequences of the war. The third theme has Congressional interest.
- 6. COMMENT: <u>Visitor Orientation and experience</u>. From my personnel perspective, the key to visiting a Civil War Battlefield and obtaining a meaningful experience is by getting a good orientation immediately upon arriving at the central visitor center. The Park could further help the visitor by identifying the predominant features of the Park and how the visitor might enhance his experience based on his interest and expected visit time. First, the visitor must get to the center. I strongly agree with the GMP that there is a need for <u>better signs</u> to direct and orient the visitor. It is very frustrating to a visitor (particularly a family) to get lost on the driving tour, locating a park feature, or just finding the central park visitor center. Better signs and an easier park road system should be explored especially in light of the proposed multi-battlefield expansion.

The typical visitor/family visiting a Civil War park most likely already has some interest just by coming to the Park facilities. Prior to entering the park most visitors have determined their expected length of visit. Current brochures provide good detailed information; however tend to provide too much info to digest quickly. Thus, I would recommend that the visitor center attempt to improve the general orientation. I would suggest that this might be achieved by highlighting the Park's major features as well as daily and special events on a large wall chart and an improved brochure. For example,

Park staff spent considerable time analyzing the utility and function of existing visitor centers/ visitor contact stations verses building new ones, but a specific cost study was not developed. The decision to rehabilitate the existing visitor center and other park buildings instead of constructing new facilities was guided through NPS policy and the recommendation of the Congressional Appropriations Committee.

In the Draft GMP/EIS on page 19, the NPS acknowledges there are significant problems at Petersburg National Battlefield in way-finding, access and signage at many locations throughout the park. In Chapter Two, "Management Prescriptions Common to All Action Alternatives" on page 61, the park proposes a considerable amount of planning and coordinating with local jurisdictions and partners interested in a larger, regional signage endeavor to address this issue. The park will seek financial support for a Transportation Planning Study funded through the United States Department of Transportation, Federal Lands Highway Program to assist these endeavors.

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#### **RESPONSE • LETTERS**

define the major activities, events, and predominant features of the park so the visitor can match his interest with his allocated time. The chart and brochure would highlight the events or park features, event locations, event duration and expected transit times (walk or drive). One visitor might be interested in the museum, another in a specific ranger talk or another in seeing a specific battlefield feature.

Finally, I agree that visitor centers should not get into the business of food services. I do believe that center personnel could help identify nearby food service sources if requested so the visitor can integrate meals into his visit experience to the Park.

In conclusion, I hope you will consider the above comments and recommendations when you develop your final plan. I wish you success and hope to visit the Park in person to see the product of your battlefield expansion efforts.

Sincerely,

David C. Peterson 13471 Satinwood Ct Spring Hill, Florida 34609-3170

#### **RESPONSE • LETTERS**

July 31, 2004

Mr. Bob Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg Virginia, 23803-4721

Dear Mr. Kirby:

I attended your presentation on the General Management Plan for the ongoing operation of the Petersburg National Battlefield in Hopewell June 30. The presentation was excellent and I am excited about the scope and significance of the work to be done. I appreciate what you and others with the National Park Service have accomplished in preparing this expansive and forward thinking project.

I am most impressed with Alternatives C and D as they impact the entire Petersburg National Battlefield and especially the City Point Unit in Hopewell. The proposed rehabilitation of Appomattox Manor as a historic house museum and Bonaccord as a visitor contact center is especially significant to Hopewell in general, the Historic Hopewell Foundation Inc. and the City Point Historic District.

It is gratifying to note existing park resources will be preserved and additional facilities for visitor interpretation and education will be provided under both Alternatives C and D.

Sincerely,

Michael Pritchard Michael Pritchard Hopewell, VA

DAMA ELIZABETH RICE 1708 Hickory Hill Road Petersburg, VA 23803 Phone: 804-733-9323 hm/off 804-733-6334 fax

August 5, 2004

Mr. Bob Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, VA 23803

Draft GMP/EIS

Dear Superintendent Kirby:

Thank you for the opportunity to comment on the Draft General Management Plan for the Petersburg National Battlefield.

First, I would like to commend you, your staff, and those who prepared this document. It is well done, easily read, very thorough, and addresses all issues.

Having been involved for some 30 years in the preservation of this park, and as a founding member of the National Parks Mid-Atlantic Council, a local official, and real estate professional my thoughts are herein contained.

I would urge the NPS to fully implement Alternative D as outlined in the Draft GMP. This Alternative allows for expansion of the current park boundaries to include significant locations and battlefields in the need of protection that are important to telling the complete story of the 'Siege of Petersburg' or as some refer to it the 'Petersburg Campaign'. The number of battles fought is very complex and having ownership and control of these sites allows for easier understanding by the visitor and thereby a border education experience.

This same Alternative D also allows for establishing partnerships with the local governments in and surrounding the battlefield. In particular, it allows for the establishment of a new or additional unit or contact station/interpretive center in downtown Petersburg. Through these partnerships and this new unit it will allow the telling of the story of the impact of the war and siege on the local citizens thereby enhancing the visitor experience and education quality of the overall story of the war.

There are many cultural resources throughout the region including landscapes, cityscapes, and structures that will be greatly enhanced through their preservation in order to tell the complete story of the Civil War. That complete story will allow for a border thematic interpretation of the war from its beginning to include the cause of the war, its direct impact, and the aftermath.

Full implementation of this Alternative D will truly give the National Park Service a opportunity to provide the complete story of the Civil War for generations to come. Let us continue to learn from the past and build on same for those future generations.

Thank you again for this opportunity and I look forward to continue to work with the Petersburg National Battlefield as it moves forward in implementing this Alternate.

Dama E. Rice

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#### **COMMENT • LETTERS**

#### **RESPONSE • LETTERS**

April 6, 2004

Bob Kirby Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, VA 23803-4721

Dear Mr. Kirby,

This letter is in reply to your Draft General Management Plan March 2004." If I have omissions or errors please feel free to correct me, as I have not had enough time to digest the whole book due to urgency in replying to you by August 6.

The Draft General Management Plan was recently brought to my attention because page 189 "List of Recipients" includes the Sons of Confederate Veterans, but not the Sons of Union Veterans of the Civil War! As a member of the local Colonel James D. Brady Camp 63 Sons of Union Veterans, I would like to have this opportunity to address you as a member of this Camp providing my insight from a Union viewpoint. These are my opinions and not that of our Camp, Department, or National Organization. Again, the deadline date prevents me from alerting these parties.

I'd first like to address things that I observed and researched, and the areas that concern me prior to selecting an Alternative Plan and my reasons for covering them and the relationship involved. I'd also like to say here that there are many wonderful areas of your park, and you and your staff should be commended for these. Due, however, to a lack of time and space I'll only address the areas I felt need attention.

- The Gowen and Pennsylvania Monument do not appear to have designated NPS
  parking spaces. The Gowen Monument parking must be accomplished by
  intruding upon the Merchant's Tire parking lot, while the Pennsylvania
  Monument is in the middle of a road with no apparent place to park. It appears
  that the Pennsylvania Monument boarder area has been hit by a car, and both
  monuments are in desperate need of cleaning.
- 2. The drive down Flank Road is a nice scenic one, but the growth of development in this area will destroy the screnity and historic features. I was, also, astonished to notice in your tour map that this is not Petersburg National Battlefield Park property since it contains key Union earthworks and forts along this famous siege road. I then discovered that prior to 1973 Flank and Defense Roads were Petersburg National Battlefield Park property, but subsequently were turned over to the City of Petersburg. You can see along the road that there were turnoffs and former NPS tour stops (also see note 5 to what they originally were), but identifying features such as interpretive signs are missing. I studied an article in the Progress Index newspaper of Feb. 19, 2004 which "Granted an easement to the Petersburg Country Club for construction of an egress from its property to the

There are no designated National Park Service (NPS) parking spaces at either the Gowan or Pennsylvania monuments. This is because the property surrounding each monument is not owned by the NPS. Park staff has been taking tours to each stop for over 24 years and have never had the City of Petersburg or any local businesses in the surrounding area voice an objection. The Pennsylvania Monument guard rail was repaired in early spring 2003 as a result of a vehicle accident, and then it was hit again last winter. In order to protect the monument, "jersey barriers" were placed completely around the monument on NPS property inside the brass railings. This action will afford protection to the monument until we receive funding to install architecturally sensitive protective measures within the monument's curtilage. The park is currently seeking funding, approximately \$250,000, to clean, repair and restore all park monuments.

The 257 acres adjoining Flank and Defense Roads were transferred to the City of Petersburg in 1973. The NPS superintendent at the time felt that the existing trench lines and environs had lost their historic integrity as a result of encroachments by single family homes and businesses. Congress agreed with the superintendent and passed legislation to permit the divestiture.

South side of Flank Road, across former National Park Service property turned over to the city in 1973. This easement area was determined by the NPS historian to contain no historical features, such as earthworks." Doesn't this violate the Federal Law concerning the transfer of this property to the City of Petersburg in such: "Justification for Inclusion-...while the lands involved are not lacking in historical significance...the City of Petersburg pursuant to an agreement which requires them to be retained in their park like character..." and "That the said Grantee will use the hereinabove described land for public street and park purposes and no new streets, entrance drives, or other developments shall be constructed in such a manner as to adversely affect existing forts, historic earthworks or other historic features." In my opinion then, the egress for the Petersburg Country should be rescinded and that no future development should blemish Flank and Defense Roads. Furthermore, since the City of Petersburg appears incapable of attending to these properties thereby forfeiting their obligation (again to wit) "and require them to be retained in their park like character," then in my opinion, the Petersburg National Battlefield Park needs to recapture these lands for the good of the American public.

- 3. On turning right on Church Road from Flank Road at Fort Fisher (tour stop 13) there is a log across the dirt road with a "US Park Boundary" sign. This is the demarcation line to Petersburg National Battlefield Park property of Fort's Welsh and Gregg, which also is of interest to our Camp as it was the position of the 63<sup>rd</sup> NY between those forts during the Siege of Petersburg. A view of the dirt road from Church Road shows that it is overgrown with brush and weeds. Walking down it to the left just inside the trail there is about dozen old tires, otherwise the rest of the way is clear of trash, but the brush and thorn bushes get up to breast high in spots along the way. Cleaning and clearing this area would affect both a handsome trail and natural avenue to the rest of the park property.
- 4. I am a descendant of a Union Soldier of the 23<sup>rd</sup> Illinois Infantry that fought at the Confederate Fort Gregg (tour stop 14). Fort Gregg is visible from Route 85, but there are no signs on 85 or on Route 1 on how to arrive there. From Fort Fisher (tour stop 13) on the Petersburg National Battlefield Park map, directions to (Confederate) Fort Gregg are to take a right on Church Road. The problem, as I see it, is that it poses a lengthy drive with no other signs to direct you further. Possibly one at Hoffheimer Way to lead visitors straight ahead further down Church Road would help. There is further up on Weakley Road a tour stop sign with an arrow directing visitors to take a right. Then at the intersection of Weakley and Simpson Roads there is no tour stop directional arrow, but Fort Gregg can be seen to the right and it would be obvious at least to me, to turn right. This ostensibly forces visitors to park at the fort at the dirt entrance of a business across the street where the tour stop 14 is located, then walk across the path mowed to the monument in front of the fort. I later discovered there is a designated NPS parking area for Fort Gregg which is confusing because there are no signs directing visitors to it. At the intersection of Weakley & Simpson Roads

As a covenant to the transfer of title, the City of Petersburg agreed to take on the responsibility for the care and maintenance of the greenways and roadways and that they would.....
"maintain the earthworks, fortification, and park-like character of the lands to be transferred." The NPS will not seek to reacquire these lands. The issue of integrity of the resources, the basis of the original divestiture, is more valid than ever. The park has provided technical assistance to the City on several occasions for the management of these lands and will continue to do so.

In the Draft GMP/EIS on page 19, the NPS acknowledges there are significant problems at Petersburg National Battlefield in wayfinding, access and signage, not just at Fort Gregg but at many other locations throughout the park. In Chapter Two, "Management Prescriptions Common to All Action Alternatives" on page 61, the park proposes a considerable amount of planning and coordinating with local jurisdictions and partners interested in a larger, regional signage endeavor to address this issue. The park will seek financial support for a Transportation Planning Study funded through the United States Department of Transportation, Federal Lands Highway Program to assist these endeavors.

#### **RESPONSE • LETTERS**

instead of taking the right to the tour stop 14 sign, take a left on Simpson Road to the next right which is Seventh Avenue. There is a sign for Campus directory and map and a parking lot, which you could assume is for that sign, but it's actually the NPS parking area for Fort Gregg. When you turn the car around to pull out you can see the tour stop directional sign letting you know to turn left to get you on your way to tour stop 15, but when you get to the end of Seventh Avenue, there is no tour stop directional sign to lead you any further. Confusing, yes? My other concern at Fort Gregg is the deplorable overgrown weed condition of the property. This special fort ranks a more manicured approach as befits a prize of Petersburg National Battlefield Park.

- 5. To continue on your current map to tour stop 15 to arrive at Five Forks, but there are no tour stop signs to it. Yes, one could follow the map provided to get to it. It currently directs visitors that long distance to Five Forks, then leaves them stranded with no tour stop 16 to follow. NPS website updated 2002 at <a href="http://www.cc.nps.gov/history/online\_books/hh/1313/hh/131.htm">http://www.cc.nps.gov/history/online\_books/hh/1313/hh/131.htm</a> gives the "Petersburg Battlefields" by Lykes. NPS Historical Handbook Series 13 Wash. D.C. 1951 and includes the old driving tour and stops, which would have taken you back to Petersburg along Defense Road, and leaving these out now in the new NPS tour is a shame to miss out on these historically significant sites. These old tour stops should be included again to take you back to Fort Gregg, and then proceed to the next site on Defense Road as tour stop 16 and so on down the road, then to finish the tour at Old Town Petersburg.
- 6. My preference, incidentally, for the Petersburg National Battlefield Park Draft General Management Plan is Alternative B "Saving the Battlefields." Alternative C only includes the addition of 2,030 acres, and Alternative B & D similarly include the addition of 7,238 acres. From my viewpoint, Plan B is the most conscientious approach to save lands from development. I've included all the above concerns and observations to demonstrate that while I appreciate the budget constraints the Park service operates under it is because of these very limitations that you should devote attention to preserving historical areas in your own back yard, instead of venturing into areas geographically distant from your supervision. This is why I'd be opposed to Alternative D in that you'd be expanding in Visitors Centers, more personnel and attended expenses which the present administration seems unlikely to approve. Or could end up in many more neglected areas of the Park. I recommend Alternative B as it gets the boundary expansion of the 7,238 acres to save the land, and use driving and hiking tours with interpretive signs along the way to tell the story.

Respectfully,

William Rose 9201 Oak River Dr. Petersburg, VA 23803 Please accept my unter comments about the 92 m P that was presented on monday evening, June 28 at union Station by P.N.B.

July 3, 2004

St usuld appear that the mission is the same that it was over three years ago; get out of Petenburg by abopting alternative plan D. after attending your meeting, I went home and started looking up some of my all records and came across some nates that I feel finally is really all about.

In 1949 I had a government teacher at the was also a pant time historian at the crater Battlifield. He would always take those

The park recognizes the significance of the battle of Old Men and Young Boys on June 9, 1864 in relation to the siege of Petersburg, Virginia during the Civil War. The story associated with this battle will most assuredly be part of the interpretative offerings provide to the public by Petersburg National Battlefield. The Draft GMP/EIS is not intended to provide information on all the battles or stories that might be considered in the future. When the Final GMP/EIS is approved, the park's Long Range Interpretive Plan will be revised to include expanded themes, new stories and potential sites. A brief description of the battle has been added in the Final GMP/EIS in Chapter one, A Brief History of Petersburg.

Page 2

Bob Kerly

July 3, 2004

of us who were interested on town of will war sites in and around Petenlung.

fort Hell was still a visitor site and Pine Gordens had many tunnels that could still be explored. Southside Station was a busy, active vailsad yard. You could still crater.

Something that Colonel Lloyd said in 1949 has come true and changed my mind about the IS MP process.

Colonel floyd said that the Peterslung Compaign was the achillies heel of the Department of Jutinor, N.P.S. From the very beginning, June 9, 1864, the nav was an embanasement for the Tederal Government.

The stony of Petenling was too important for history's sake for it not to be told. How do you tell a stong that you don't must to tell. I may do as the OVPS has Some in Betendung, glass the forest for the trees game.

Bob Kirly Page 5

July 3, 2004

civil War Lites in aminia to a local government that had no plans as to what to do with the gift in 1973 and they still have no plans in 2004. Sally, Petenling has no simples funds to do anything.

The NPS will always be uslking on it's achillies heel in Petenburg until it owns up to it's muslake in 1973 and take lack Flank and Defense Roads and put it's resources towards completing the job they left undone in Petenburg and stop playing the Forest for the Frees game.

This act will finally lift the seige of Petershung.

Wortherse V. 1725 tarrial St. Petenlung YB

4

#### **RESPONSE • LETTERS**

Thank you for your comments.

08/12/2004 11:38 8047323615

PETERSBURG NB

PAGE 07/07

Friday, August 6, 2004

**Bob Kirby** Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, VA 23803 - 4721

Dear Superintendent Kirby,

Thank you for the opportunity to comment on the draft Petersburg General Management Plan. I strongly support proposals to expand the park's boundary by at least 7,238 acres, and to expand its interpretive themes to include more information on the roles of African Americans and of women in the Petersburg Campaign.

This boundary expansion goal is reasonable, even conservative, given that it represents a subset of remaining unprotected lands related to the campaign. An expanded park with enhanced interpretation will benefit the region by attracting more, and more diverse, visitors to the park. And while photographs, brochures, films, and other media are useful tools for educating the public about the stories and significance of Petersburg, nothing compares to the impact on a visitor from moving through the landscapes of history, being able to imagine historic events without having to imagine away modern intrusions.

I urge members of Congress and other officials to support legislation to expand the boundary, and to provide funding to enable the Park Service to protect lands inside the expanded boundary for park purposes, as soon as possible. The integrity of the land will only diminish, and the cost of protecting it will only increase, with the passage of time.

Ashley Stephen 7363 George Early Road Centerville, IN 47330 - 9683

07/02/04

Superintendent Petersburg National Battlefield 1539 Hickory Hill Road Petersburg, VA 23803-4721

Dear Sir,

I speak on behalf of an informal group of about a dozen citizens who are interested in the future development of the Petersburg National Battlefield as it relates to the City of Petersburg.

As outlined in your Draft Management Plan, we strongly endorse Options C or D which envision: a jointly operated visitor's center in Old Towne Petersburg with the City and National Park Service cooperating to tell the full story of the Petersburg Campaign.

Very Truly Yours,

John H. Van Landingham, Jr.

#### **RESPONSE • LETTERS**

6 August 2004

116B West Bank Street Petersburg, Virginia 23803

Superintendent
Petersburg National Bartlefield
1539 Hickory Hill Road
Petersburg, Virginia 23803
Dear Sin: 1504

I am writing to express my very strong personal support for Alternative D of Petersburg National Battlefield's Draft General Management Plan / Environmental Impact Statement, dated March, 2004.

Alternative D will do several things that I like very much.

First, it will protect and interpret many thousands of acres of battlefield lands that are now uninterpreted and unprotected.

Second, it will expand the range of stories that are told by the Petersburg National Battlefield to include such matters as the causes and the aftermath of the Civil War, and the critical roles of African-Americans and women. This will both greatly enrich the power of the interpretation and attract a much broader audience.

Third, it will use the landscapes and cityscapes of the Petersburg area to tell all of these stories, instead of relying heavily on the visitor centers and contact stations to do the job. At the same time, the visitor centers and contact stations themselves and their programs will be increased in size and number and enriched.

Fourth, it will establish a fifth unit of the Petersburg National Battlefield, tentatively called *The Homefront*, with a contact station developed through a partnership between the PNB and the City of Petersburg. This will make it possible to bring Petersburg's great treasure chest of Civil War resources, both physical locations and stories, into play, to tell the story of Confederate command and logistical operations; the story of the impact on the city of ten months of siege and bombardment; the story of the struggle between radical and moderate antebellum leaders in Petersburg that led rather directly to Virginia's secession and civil war; the story of dramatic struggle of both white and black Petersburgers to "adjust" to new realities after the war.

Again, I unequivocally support Alternative D.

However, I have come to realize that I would prefer another name for the Old Town unit, rather than *The Homefront*. Upon reflection, I have decided that, since so many people in this nation think primarily of factories and women sewing and cooking when they think of "Homefront," using the name would give them a highly inaccurate picture of what the unit is intended to be about. Not that it is will not include factories and women (though not thousands of miles from the "home front," as in the old 2<sup>nd</sup> World War and Korean War newsreels), but it will deal with so much more—the command and logistical operations of the Confederate armies themselves, not just in getting to the battles from a distance but in the midst of the battles themselves; the continual bombardments that the city was subject to, resulting in damage to 800 buildings, many of which are still to be seen; the dislocation, impoverishment, and near-starvation of thousands of terror-stricken people, though it lasted so long that it eventually came to seem to be the norm; the verbal posturing of Southern Nationalist and Unionist newspaper editors and politicians in Petersburg, including the statewide leaders of both the moderates and the radicals; and the role of African-Americans in the Petersburg area in fomenting and fighting the war, and in creating a new reality after the war.

The naming of the "Home Front" as a proposed designation for the new management unit has been carefully analyzed by park staff. To cover all the themes proposed in the GMP, park staff felt this was an appropriate name to carry out this comprehensive tasking. According to The American Heritage Dictionary of the English Language (2000), HOME FRONT means: "The civilian population or civilian activities of a country at war." Park staff analyzed other proposed names, such as "The Besieged City" or "The City Besieged." and felt these and others would not adequately encompass all of the themes that might be covered and some actually would have excluded them. Themes in Old Town Petersburg will cover at least a thirty-year time span from 1850 – 1880, rather than just a nine and one half month period implied by "The Besieged City." Understandably, from the point-of-view of the city's Tourism Department, an appealing label is important to attract visitors to the proposed partnership visitor contact station. But, until a more suitable label is identified, "The Home Front" is the most inclusive for the park's administrative needs. When coupled with the new Petersburg Campaign designations of "The Eastern Front," and "The Western Front," there should be no misunderstanding by the visitors as to what "The Home Front's" story will be all about. Park staff are not opposed to finding a better label but as yet, feel "The Home Front" serves that purpose most adequately.

What to change it to? I know that "The Besieged City" and "The City Besieged" were considered. I had come up separately with this name before Mr. Calkins told me that they had been considered. I believe that this name would be both far more descriptive of the interpretive significance of the unit than "The Homefront," so I would certainly support its use. But there are other possibilities too. I would also be happy to sit down with a committee, which might include both interpretive people and marketing people, to work on a permanent name. Names are very important, with a powerful influence on the future, so we should get it right from the beginning.

In addition, I conceive of the unit as consisting of far more than a visitor contact station; rather, I see it as heritage education center, paralleling the original conception of the downtown visitor center for the Richmond National Battlefield Par, or perhaps as the "Petersburg Civil War Visitor Center," paralleling the present the present Tredegar center. The unit would provide powerful exhibits of its own, but more importantly would be the center for a significant cluster of programs and tours of related buildings and neighborhoods.

Moreover, the best place to create such a center, by far, is the South Side Railroad Depot. It is of utmost importance to the community that the Petersburg National Depot be located in this wonderful structure. We simply cannot afford to fail to make this happen.

I want also to see the establishment of an effective partnership between the City, PNB, and others in the community to develop and implement a plan for the protection, enhancement, and interpretation of the Flank and Defense toads corridors, starting with renaming the roads as "parkways."

Another partnership should be established, with many of the same players, to perform a thorough survey of all Civil War assets in the Petersburg area, and to find ways to protect and interpret them.

At City Point, I would like to see expanded emphasis on interpretation of the port/U.S. Military Railroad/logistics there. The best way to do this would be to find ways to develop and operate a replica steam train and a replica steamboat carrying visitors between Old Town and City Point.

Likewise, I'd like to see interpretation of major earlier periods of history at City Point, such as the May 9, 1607, visit by the vessels of the Virginia colony, before the settlement at Jamestown, and the fact that during the 18th century, the bay off City Point was the largest tobacco port in North America and the largest port for the entry of African slaves into Virginia. The Africans were sold from the decks of slave ships in this bay, fresh from the Middle Passage.

Again, I very strongly support the extremely well-conceived alternative that the PNB prefers, Alternative D. Official adoption and effective realization of this alternative will make a profound difference for this region and will change the way the story of the Civil War is told forever, everywhere, to America's long-lasting benefit.

Sincerely,

R. Dulaney Ward, Jr.

#### **COMMENT • ELECTRONIC MAIL**

#### **RESPONSE • ELECTRONIC MAIL**

Subject: Draft Management Plan Author: rjcmvaz@juno.com

Date: 08/06/2004

Having found out about the call for comments only yesterday, my comments will be brief in order to meet the deadline. It would seem that from the many stories that I have heard from my good friend and colleague Col. James L. Morrison, Jr. about the importance of Petersburg, VA in the Civil War struggle that Alternative D would be warranted. Col. Morrison is a native of Petersburg and a widely recognized Civil War historian. Thank you for this opportunity to provide input on this very important matter. Sincerely, Richard J. Clark, Ph.D.

Thank you for your comments.

**Subject:** 

Comments on Petersburg National Battlefield GMP Author: kenconserv@charter.net

Date: 0726/2004

Dear Sirs.

Please accept this as my official comment on the Draft General Management Plan for the Petersburg National Battlefield. As a descendent of several Civil War veterans and a frequent visitor to Virginia, I speak as one of many Americans deeply concerned for the future of our remaining Civil War battlefields. Petersburg is a national treasure, hallowed ground, and must be adequately preserved as a memorial to those who fought so bravely and for future generations.

I strongly support **Alternative D: The Landscapes Tell the Stories.** The first priority of the National Park Service must be the preservation of the most important 7,238 acres of battlefield lands that remain unprotected. If these are lost to development, as they certainly will if left unprotected, the integrity of the entire battlefield will be greatly diminished. Restoring the landscapes to their appearance during the war will create an enormously compelling setting in which visitors will connect emotionally and spiritually with the momentous events that occurred in Petersburg. Please keep me informed as you conclude this planning process and reach a final decision. Thank you. Ken Goldsmith

#### **COMMENT • ELECTRONIC MAIL**

#### **RESPONSE • ELECTRONIC MAIL**

Subject: Comments on the Draft General Management Plan for

Petersburg NB

Author: lheyd@txi.com

Date: 08/06/2004

Dear Mr. Kirby:

This email provides comments on the draft General Management Plan (GMP) for the Petersburg National Battlefield. This email presents comments from Chaparral Steel Company, Chaparral (Virginia) Inc. and Brookhollow Virginia, Inc. (collectively referred to as Chaparral Steel). As you are aware, Chaparral Steel owns property in Dinwiddie County, some of which is adjacent to Petersburg National Battlefield property along Flank Road between Church Road (Highway 672) and Halifax Road (Highway 604).

We applaud your efforts to develop a GMP that can be used as a guide to preserve and protect the unique cultural resources, interpret them for the public and provide appropriate development. The vision provided by the GMP will be valuable to the National Park Service and also to other individuals and organizations.

We support Alternative D of the four management alternatives presented in the draft GMP. This alternative is the most comprehensive and would provide enhanced protection and preservation of resources. This alternative also gives visitors to the area more opportunities to learn about the Civil War and experience the landscapes and geography of the battles.

This alternative would significantly expand the amount of land preserved. We think that the National Park Service should encourage the donation of land and seek funding to purchase property from willing sellers. We would strongly object to the use of condemnation as a means of obtaining land. We also support the use of easements as a way to preserve property. We will note that we have placed an easement on a portion of our property adjacent to the Petersburg National Battlefield. This land is denoted as 'Protected by Others' in the GMP, since the Civil War Preservation Trust holds this easement.

#### **COMMENT • ELECTRONIC MAIL**

#### **RESPONSE • ELECTRONIC MAIL**

We feel that the primary emphasis within Alternative D should be centered geographically on the City of Petersburg. We urge the National Park Service continue to work with the City of Petersburg to enhance the Old Towne Petersburg area as a valuable resource to visitors and local citizens. We would prefer that resources be allocated to areas in and near the City of Petersburg with relatively less emphasis on City Point and Five Forks.

We appreciate the opportunity to provide comments, and continue to applaud your efforts to preserve significant places in our nation's history. Sincerely, Lawrence Heyd, Environmental Manager

Subject: Park plan

Author: JLAFRAMBOISE@KSHS.ORG

Date: 07/07/2004

Expanding the park's boundary is an important and necessary investment in the future of the site and could have economic benefits. Suburban sprawl has become a threat. If we do not act today, Petersburg is in danger of becoming a green median strip surrounded by sprawl and traffic. Adding unprotected acres is a timely thing to do.

Date: 08/06/2004

Thank you for the opportunity to comment on the draft Petersburg General Management Plan. I strongly support proposals to expand the park's boundary by at least 7,238 acres, and to expand its interpretive themes to include more information on the roles of African Americans and of women in the Petersburg Campaign.

This boundary expansion goal is reasonable, given that it represents a subset of remaining unprotected lands related to the campaign. An expanded park with enhanced interpretation will benefit the region by attracting more, and more diverse, visitors to the park. And while photographs, brochures, films, and other media are useful tools for educating the public about the stories and significance of Petersburg, nothing compares to the impact on a visitor from moving through the landscapes of history, being able to imagine historic events without having to imagine away modern intrusions. I would also encourage the park to hire enough interpretive rangers to educate visitors about the site's significance. I have always found attending ranger programs to be more memorable and as informative, if not more so, than non-personal informational panels.

I will also be urging my members of Congress to support legislation to expand the boundary, and to provide funding to enable the Park Service to protect lands inside the expanded boundary for park purposes, as soon as possible. The integrity of the land will only diminish if left unprotected, and the cost of protecting it will only increase with the passage of time. Thank you for your consideration of my comments. Please let me know how you intend to proceed on this issue. I look forward to your response. Please respond by e-mail if possible. Sincerely, Christopher Lish

Thank you for your comments.

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#### **COMMENT • ELECTRONIC MAIL**

#### **RESPONSE • ELECTRONIC MAIL**

**Subject: Sierra Club Comments on GMP** 

Author: erthshr@comcast.net

Date: 08/06/2004

Dear Superintendent Kirby:

The Falls of the James Group Sierra Club, local to your area, is recommending Alternative D be selected. This selection will afford the greatest exposure to the general populace to the wonders and the vistas that will comprise the Western Front, greatly ignored to date.

Whereas, we realize there will be modification of the current landscapes to attain viewsheds more consistent with the period, however, having studied your documentation of environmental, agricultural, wetland and other impacts, we feel the historical significance of the changes will be worthwhile to bring the visitor "to the moment." Additionally, the comfort stations will also enhance the experience for the visitor.

There are additional local concerns that must be addressed during the selection phase that have been voiced by local historians and members of the public for protections of places not currently mapped by the National Park Service. In addressing environmental concerns, we keep "discovering" these sites and earthworks in need of identification, mapping, and conservation. Fortunately, we are also finding individuals willing to help to conserve and additionally share their small treasures with the public. As you indicate "The sites of the Western Front have been cut off from their larger battlefields and have experienced extensive deforestation, but there has been minimal physical dismantling of the fortifications." Please plan to address in Alternative D the cooperative efforts of local homeowners, the county, and Conservation Elements such as the Civil War Preservation Trust to preserve these treasures as they are encountered. Meanwhile, citizens and the Sierra Club will continue to work to ensure they are documented and entered onto a DISTRICT nomination for the future. Sincerely, Diana C. Parker, Conservation Chair

Under "Common to All Action Alternatives" in Chapter 2, park staff would encourage private landowners to pursue other mechanisms, such as preservation easements, to protect the historic resources contained on their properties. The park anticipates working with a variety of partners to reduce development and land acquisition costs. Park staff have working relationships with notable land preservation organizations, including the Civil War Preservation Trust, The Conservation Fund, the National Park Foundation, Izaak Walton League and the Virginia Outdoors Foundation. Working together, considerable progress has been made in preserving nationally significant Civil War battlefields such as: Reams Station, White Oak Road, Hatchers Run, and Five Forks. Although, the NPS may never own all or most of these properties, working with partners helps ensure that these lands are preserved for the understanding and enjoyment of this and future generations.

COMMENT • ELECTRONIC MAIL	RESPONSE • ELECTRONIC MAIL
Subject: battlefield interpretation Author: pettusrob@cavtel.net Date: o6/15/2004 Please steer the upcoming discussion regarding long term management so that the men who fought there are the focus NOT some currently popular sociological discussion. Best Regards, Robert Pettus, Native Virginia	Thank you for your comments.
Subject: Support of GMP Author: Redferniii9@aol.com Date: 08/08/2004	Thank you for your comments.
Dear Sir: As President of the High Street Association, Petersburg, I attended a brief on the General Management Plan by Mr. Kirby, and have reviewed the Draft GMP, dated March 2004. I fully support Alternative D. Respectfully, Tom Redfern	
Subject: The best way to protect Petersburg Battlefield Author: jane_rigney@timemagazine.com Date: o8/o5/2004  I am writing to ask you to retain the integrity of this site and honor the more than 150,000 soldiers who fought here, as well as all the civilians impacted by the siege. I urge you to adopt proposals to extend the park boundary by 7,238 acres and include more information on the roles of African Americans and of women in the campaign. Thank you for reading my message.  Very sincerely yours, Jane Rigney	Thank you for your comments.

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### **COMMENT • ELECTRONIC MAIL**

#### **RESPONSE • ELECTRONIC MAIL**

**Subject: GMP** 

Author: williamshiner@earthlink.net

Date: 08/05/2004

Hope it is not too late for input regarding the draft GMP. I favor the expansion of the boundaries to include the sites of significance around Petersburg. I realize that many of the major sites have been destroyed ("Fort Hell", for instance) and others are threatened with development or are otherwise in jeopardy. I also favor enhanced interpretation of the events and sites relative to Petersburg during the Civil War.

Dr. J. W. Shiner, Max Meadows, VA

Thank you for your comments.

#### **COMMENT • ELECTRONIC MAIL**

#### **RESPONSE • ELECTRONIC MAIL**

Subject: GMP

Author: wildbill@sillysports.com

Date: 08/05/2004

Dear Mr. Kirby,

Enclosed find my comments regarding the National Park Service's proposed General Management Proposal for the Petersburg National Battlefield Park. My passion for the War Between the States spans over 40 years. I am an associate member of SCV Camp 1506 and a Confederate Reenactor as well. As such, an historical preservation effort would normally meet with my enthusiastic approval. However, a few things come to mind:First, folks I know who've visited the Petersburg Battlefield Park tell me stories of it being "run-down" in certain areas, i.e., 4 foot high grass, buildings in run-down condition, etc. The Petersburg campaign covers almost a 40-mile long area. If maintaining Park Service land is difficult now, how much more difficult will it be to maintain more land and more visitor areas? My question would be then, is there money available for such a large project as you describe in the GMP proposal? Or perhaps, will new areas be acquired, at the cost of letting old areas deteriorate or pass out of Park Service hands entirely? Second, I found the absence of the "9th of June" scenario disturbing. You'll pardon me, but I an associate member of an SCV camp, a confederate reenactor, and I've been what you might call a southern sympathizer since the age of 10. Not only is the absence of this historical event disturbing to those whose interests focus on the south, but I believe it ignores what the general public is looking for as well. If the public is looking, as you seem to imply, for human interest stories, then it would seem to me that the visiting public would be quite interested in the motivations of 125 old men and boys who went out shouldering 50 year old muskets to confront a union cavalry force 10 times their number.

Third, the Petersburg Campaign spans 9 months and a huge area. It would be impossible for the Park Service to render a "presentation" of this event without expanding its role to cooperation with privately owned parks and museums, as well as the City of Petersburg itself. If the bombardment

Much of the tall grass you see in the park these days reflects a new stratagem of battlefield maintenance. Where earthen fortifications once stood, the park now allows the grass to grow as a way of delineating the outline of those structures. Since we cannot remove all of the vegetation to approximate the appearance during the Campaign, the grass is allowed to grow where it has not done so before. The completion of this GMP will ultimately place this park in a much better position to compete for appropriated and programmatic funds, thus greatly enhancing all aspects of the park.

The park recognizes the significance of the battle of Old Men and Young Boys on June 9, 1864 in relation to the siege of Petersburg, Virginia during the Civil War. The story associated with this battle will most assuredly be part of the interpretative offerings provide to the public by Petersburg National Battlefield. The Draft GMP/EIS is not intended to provide information on all the battles or stories that might be considered in the future. When the Final GMP/EIS is approved, the park's Long Range Interpretive Plan will be revised to include expanded themes, new stories and potential sites. A brief description of the battle has been added in the Final GMP/EIS in Chapter one, A Brief History of Petersburg.

the Park Service would have to include some kind of stop for visitors within the limits of the Old Town itself. Fourth: I am pleased that you included the role of African Americans who supported the South in your presentations. I would hope to see mention of such individuals as Phillip Slaughter and Dick Poplar in those presentations. Those who would seek to demonize the South often oversimplify Black participation in the War Between the States. In point of fact, black sympathies were often as confused and conflicted as those of their white counterparts. Finally, while my love of history would ordinarily spark my enthusiasm with regard to your efforts, the fact that the Park Service's revised presentations at its Civil War battlefield parks stem from legislation introduced by Jesse Jackson Jr. (D-Ill), in 2000, is to me, troubling at best. It is clear from Mr. Jackson's "foreword" in the National Park Service's online Book, "Rally on the High Ground", http://www.cr.nps.gov/history/online\_books/rthg/chap1.htm, that he seeks to use the power of his office and "the force of law", to mandate that his own "perspective" of the Civil War be presented in national battlefield parks. However, those parks are the domains of the taxpayers, many of which do not share his views. Mr. Jackson stated, "... As I sought and probed answers to very difficult questions from some members of the National Park Service, many of those who did not know I was a member of Congress, informed me that in order to change their opinion about what they saw and did, it would take nothing less than an act of Congress. So, less than one session later, I have given those folks their act of Congress. Now let me try to tell you my perspective once again. This time with the force of the law...".It is also clear that Mr. Jackson has an agenda, one quite apart from the presentation of history for example, I do not see what the concept of reparations for slavery has to do with national battlefield park presentations? "....From the African Americans' perspective, it would be perceived and considered a down payment on reparations..."Apparently, Mr. Jackson has never read Robert Penn Warren, who, more than 40 years ago said, "The Civil War is America's FELT history, that is not to say, that all Americans FEEL it in exactly the same way". As an American, Mr. Jackson is entitled to his "feelings" regarding the Civil War. He is not entitled to impose his "Feelings" on the rest of us, and certainly not at taxpayers' expense. Since the details of exactly how the new presentations will be presented are absent in the Petersburg GMP, I would hope that the Park Service would keep Mr. Warren's observation in mind, leaving all Americans to "feel" as they will. Regards, William P. VallanteAssociate Member, SCV Camp 1506, Reenactor, 9th Va. Co. C.

endured by the citizens is to be documented, then it would seem to me that

Author: petgcurator@earthlink.net

Date: 08/06/2004

From: Laura Willoughby, Curator of Collections, Petersburg Museums, City of Petersburg, 15 W. Bank St., Petersburg, VA 23803.

Alternative D best preserves battlefields by expanding the boundaries to 7, 238 acres. Simultaneously, the added focus on the cultural landscape would increase awareness and interest in preservation of buildings and historical landscapes among residents and business owners in and adjacent to the areas of impact, especially in Old Town Petersburg.

Alternatives C & D would provide visitors with the best opportunity to experience the Petersburg Campaign, especially alternative C's emphasis on utilizing interactive and animated programs, interpretive tools and staff. The expanded facilities included in alternative C & D would best orient visitors to the park (and other local) resources, especially with the addition of a centralized visitor contact station in Old Town Petersburg.

Again, alternatives C & D maximize the potential for partnerships, especially with the City of Petersburg's museum and tourism staff, in the management of facilities and dissemination of information, especially concerning the utilization of resources used to interpret the home front in Old Town Petersburg. Life on the home front is already the focus of a permanent exhibit at the Siege Museum in Old Town. The exhibit is in need of updated interpretive information, more interactive and visual activities and additional artifacts that convey the history and experience of the siege and daily life on the home front. With a re-installation of the exhibit and new interpretive materials, the Siege Museum could become the central exhibition and resource center for visitors interested in learning about life on the home front. It would be beneficial for the staff of the Petersburg Museums and the staff of the Petersburg National Battlefield to share information on artifacts and archival material held by each organization, especially those that pertain to the siege of Petersburg. Joint preservation, conservation, and documentation of artifacts and archives pertaining to the siege would improve scholars' access to archival information and the

Thank you for your comments.

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#### **COMMENT • ELECTRONIC MAIL**

#### **RESPONSE • ELECTRONIC MAIL**

collections. In addition, the expertise of the staff of both organizations could be utilized to create an updated dynamic exhibition on life on the home front at the Siege Museum.

Additionally, the opportunities for partnerships between museum and park staff on public relations and marketing, especially for group tours and additional educational programs would increase the visibility of both organizations within and outside of the community.

**Subject: Draft Management Author: scv1610@aol.com** 

Date: 06/27/2004

Dear Superintendent Kirby,

Direct and to the point. I love the Cockade City. Recently I had the pleasure of touring Mr. Reinhard Dearing, Chief Administrative Officer, Slidell, Louisiana and descendant of General James Dearing around the city. Mr. Dearing was humbled by all the history we have and stated repeatedly that he wished he, in a volunteer capacity, could take over the tourism and enhance the city's tourist attractions. He was somewhat dismayed that the Draft Management Plan, instead of emphasizing Petersburg's attractions, was shifting emphasis to General Grant's logistics base at City Point and the ending of the Petersburg Campaign at Five Forks. He was also appalled that the interpretive centers on the Crater tour placed little emphasis on the bravery of soldiers, both North and South, and focused on brutalities to black soldiers. The relinquishment of previous park property entrusted to their care for preservation was also of major concern. One need only look at the thousands of black soldier deaths inflicted by General Benjamin Butler in the Dutch Gap canal venture to see where the true savagery of the black Union soldiers took place. As a member of a local Sons of Confederate Veterans Camp, I have worked diligently to enhance the cities recognition of its role in history. Memorial Day services, care of Blandford, Bethel, and Ettrick cemeteries have taken over my life since retiring from 42 plus years of service with the Department of Defense. An upcoming initiative is a grave marker dedication for one of Petersburg's own,

Thank you for your comments.

Richard "Dick" Poplar, a black Confederate who served his nation well. There can only be one acceptable alternative among the four being considered. Petersburg MUST be the focal point of any consideration. One need only visit Gettysburg, Pennsylvania to envision what this focus can mean to this economically depressed area. The National Park Service's dedication to preservation, so evident at Gettysburg, in the past has been sadly lacking here. Thank you for your ongoing work as Superintendent and for your dedication to ensuring public input to the Draft GMP/EIS. Sincerely, David L. Wright

**Subject: Petersburg General Management Plan Author:** 

Date:

Thank you for the opportunity to comment on the draft Petersburg General Management Plan. I strongly support proposals to expand the park's boundary by at least 7,238 acres, and to expand its interpretive themes to include more information on the roles of African Americans and of women in the Petersburg Campaign. This boundary expansion goal is reasonable, even conservative, given that it represents a subset of remaining unprotected lands related to the campaign. An expanded park with enhanced interpretation will benefit the region by attracting more, and more diverse, visitors to the park. And while photographs, brochures, films, and other media are useful tools for educating the public about the stories and significance of Petersburg, nothing compares to the impact on a visitor from moving through the landscapes of history, being able to imagine historic events without having to imagine away modern intrusions. I urge members of Congress and other officials to support legislation to expand the boundary, and to provide funding to enable the Park Service to protect lands inside the expanded boundary for park purposes, as soon as possible. The integrity of the land will only diminish, and the cost of protecting it will only increase, with the passage of time.

The park received 904 form letters generated through a "Call to Action" placed on the National Parks Conservation Association website. A list of names is available at the park for review.

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National Park Service Petersburg National Battlefield  U.S. Department of the Interior Virginia	1539 Hickory Hill Road Petersburg, VA 23803
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p Code 22,803	
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The process for determining the battlefields for Alternatives B, C and D is detailed on pages 21-36 in the Draft GMP/EIS. With the Petersburg Campaign being fought over 176 square miles (100,000+ acres), park staff looked hard at what met NPS criteria for preservation. Of the 100,000 acres, only 23,000 acres still retained its historical integrity. Recognizing that the preservation of 23,000 acres by the NPS is unrealistic, park staff used the Civil War Sites Advisory Commission's Class "A" and "B" designated battlefields only for the boundary expansion. Many of the nationally significant battlefields in northern Dinwiddie County are Class "C' and "D" battlefields.

The NPS is committed to working with partners to ensure that these battlefields in Dinwiddie County are preserved for the understanding and enjoyment of this and future generations. Park staff encourage private landowners and Dinwiddie County to pursue other mechanisms, such as preservation easements, to protect the historic resources contained on these properties. Working relationships with notable land preservation organizations, including the Civil War Preservation Trust, The Conservation Fund, the National Park Foundation, Izaak Walton League and the Virginia Outdoors Foundation have led to considerable progress in preserving nationally significant Civil War battlefields such as: Reams Station, White Oak Road, Hatchers Run, and Five Forks.

Additional Comments:
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Please mail or email comments to:
Superintendent
Petersburg National Battlefield
1539 Hickory Hill Road
Petersburg, VA 23803
pete\_gmp@nps.gov

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National Park Service

U.S. Department of the Interior

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Petersburg National Battlefield

1539 Hickory Hill Road

Petersburg, VA 23803

Thank you for your comments.

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pete\_gmp@nps.gov

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City, State	Petersburg	VA	
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Petersburg National Battlefield
1539 Hickory Hill Road
Petersburg, VA 23803
pete\_gmp@nps.gov

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	il Park Service	Petersburg National Battlefield	
U.S. Dep	oartment of the Interior	Virginia	Petersburg, VA 23803
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Thank you for your comments.

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Please mali or email comments to:
Superintendent
Petersburg National Battlefield
1539 Hickory Hill Road
Petersburg, VA 23803
pete\_gmp@nps.gov

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Thank you for your comments.

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# Enabling Legislation

An Act To provide for the inspection of the battle fields of the siege of Petersburg Virginia approved February 11 1925 (43 Stat. 866).

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled. That a commission is hereby created, to be composed of the following members, who shall be appointed by the Secretary of War:

- (1) A commissioned officer of the Corps of Engineers, United States Army;
- (2) A veteran of the Civil War, who served honorably in the military forces of the United States: and
- (3) A veteran of the Civil War, who served honorably in the military forces of the Confederate States of America.

SEC. 2. In appointing the members of the commission created by Section I of this Act the Secretary of War shall, as far as practicable, select persons familiar with the terrain of the battle fields of the siege of Petersburg, Virginia and the historical events associated therewith.

SEC. 3. It shall be the duty of the commission, acting under the direction of the Secretary of War to inspect the battlefields of the siege of Petersburg, Virginia in order to ascertain the feasibility of preserving and marking for historical and professional military study such fields. The commission shall submit a report

of its findings to the Secretary of War not later than December 1, 1925.

SEC. 4 There is authorized to be appropriated, out of any money in the Treasure not otherwise appropriated, expenses, in the sum of \$3,000 in order to carry out the provisions of this Act.

An Act To establish a national military park at the battle fields of the siege of Petersburg, Virginia approved July 3, 1926 (44 Stat. 822).

Be it enacted by the Senate and House of Representatives of the United Sates of America in Congress assembled, That in order to commemorate the campaign and siege and defense of Petersburg, Virginia, in 1864 and 1865 and to preserve for historical purposes the breastworks, earthworks, walls, or other defenses or shelters used by the armies therein, the battle fields at Petersburg, in the State of Virginia, are hereby declared a national military park whenever the title to the same shall have been acquired by the United States by donation and the usual jurisdiction over the lands and roads of the same shall have been granted to the United States by the State Of Virginia that is to say, one hundred and eighty five acres or so much thereof as the Secretary of War may deem necessary in and about the city of Petersburg. State of Virginia. (16 U.S.C. 432).

SEC. 2. That the Secretary of War is hereby authorized to accept, on behalf of the United States, donations of lands, interests therein,

or rights pertaining, thereto required for the Petersburg National Military Park. (16 U.S.C. 423a)

SEC. 3. The affairs of the Petersburg National Military Park shall, subject to the supervision and direction of the Secretary of War, be in charge of three commissioners, consisting of Army officers, civilians, or both, to be appointed by the Secretary of War, one of whom shall be designated as chairman and another as secretary of the commission. (16 U.S.C. 423b)

SEC. 4. It shall be the duties of the commissioners, under the direction of the Secretary of War, to superintend the opening or repair of such roads as may be necessary to the purposes of the park, and to ascertain and mark with historical tablets or otherwise, as the Secretary of War may determine, all breastworks, earthworks, walls, or other defenses or shelters, lines of battle, location of troops, buildings, and other historical points of interest within the park or in its vicinity, and the said commission in establishing the park shill have authority, under the direction of the Secretary of War, to employ such labor and service at rates to be fixed by the Secretary of War, and to obtain such supplies and materials as may be necessary to carry out the provisions of this Act. (16 U.S.C. 423c.)

SEC. 5. The commission, acting through the Secretary of War, is authorized to receive gifts and contributions from States,
Territories, societies, organizations, and individuals for the Petersburg National Military Park: Provided, That all contributions of money received shall be deposited in the Treasury of the United States and credited to a fund to be designated "Petersburg National Military Park Fund,"

such fund shall be applied to and expended under the direction of the Secretary of War, for carrying out the provisions of this Act. (16 U.S.C. 423d)

SEC. 6. It shall be lawful for the authorities of any State having had troops engaged at Petersburg, to enter upon the lands and approaches of the Petersburg National Military Park for the purpose of ascertaining and marking the lines of battle of troops engaged therein: Provided, That before any such lines are permanently designated, the position of the lines and the proposed marking them by monuments, tablets, or other wise, including the design and inscription for the same, shall be submitted to the Secretary of War and shall first receive written approval of the Secretary, which approval shall be based upon formal written reports to be made to him in each case by the commissioners of the park: Provided, That no discrimination shall be made against any State as to the manner of designating lines, but any grant made to any State by the Secretary of War may be used by any other State. (16 U.S.C. 423e)

SSEC. 7. If any person shall, except by permission of the Secretary of War, destroy, mutilate, deface, injure, or remove any monument, column, statues, memorial structures, or work of art that shall be erected or placed upon the grounds of the park by lawful authority, or shall destroy or remove any fence, railing, enclosure, or other work for the protection or ornament of said park or any portion thereof, or shall destroy, cut, hack, bark, break down, or otherwise injure any tree, bush, or shrubbery that may be growing upon said park, or shall cut down or fell or remove any timber, battle relic, tree or trees growing or being upon said park, or hunt within the limits of the park, or shall remove or destroy any breastworks, earthworks, walls, or

other defenses or shelter or any part thereof constructed by the armies formerly engaged in the battles on the lands or approaches to the park, any person so offending and found guilty thereof, before any United States commissioner or court, justice of the peace of the county in which the offense may be committed, or any other court of competent jurisdiction, shall for each and every such offense forfeit and pay a fine, in the discretion of the said United States commissioner or court, justice of the peace or other court, according to the aggravation of the offense, of not less than \$5 nor more than \$500, one half for the use of the park and the other half to the informant, to be enforced and recovered before such United States commissioner or court justice of the peace or other court, in like manner as debts of like nature are now by law recoverable in the several counties where the offense may be committed. (16 U.S.C. 423f)

SEC. 8. The Secretary of War, subject to the approval of the President, shall have the power to make and shall make all needful rules and regulations for the care of the park, and for the establishment and marking of lines of battle and other historical features of the park (16 U.S.C. 423g)

SEC. 9. Upon completion of the acquisition of the land and the work of the commission, the Secretary of War shall render a report thereon to Congress, and thereafter the park shall be placed in charge of a superintendent at a salary to be fixed y the Secretary of War and paid out of the appropriation available for the maintenance of the park. (16 U.S.C. 423h)

SEC. 10. To enable the Secretary of War to begin to carry out the provisions of this act, there is hereby authorized to be appropriated not more than the sum of \$15,000, out of any moneys in the Treasury not otherwise appropriated to be available until expended, after the United States has acquired title, and disbursements under this Act shall be annually reported by the Secretary of War to Congress. (See 16 U.S.C. 423i)

Excerpt from "An Act To authorize appropriations for construction at military posts, and for other purposes," approved February 25, 1929 (45 Stat 1301,1305): SEC. 4. That the Secretary of War be, and he is hereby, authorized to transfer to the Petersburg National Military Park such portion of the Camp Lee Military Reservation, Virginia, as in his discretion may be required in connection with the establishment of the Petersburg National Military Park, as authorized in the Act of Congress approved July 3, 1929.

An Act To add certain surplus land to Petersburg National Military Park, Virginia, to define the boundaries thereof, and for other purposes, approved September 7, 1949 (63 Stat 691).

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled.

That the Department of the Army is hereby authorized and directed to transfer to the Department of the Interior, without reimbursement, two tracts of land, comprising two hundred six acres, more or less, situated on either side of Siege Road adjacent to Petersburg National Military Park, Virginia. Upon completion of such transfer all lands,

interest in lands, and other property in Federal ownership and under the administration of the National Park Service as part of or in conjunction with Petersburg National Military Park, in and about the city of Petersburg, Virginia, and comprising one thousand five hundred thirty-one acres, more or less, upon publication of the description thereof in the Federal Register by the Secretary of the Interior shall constitute the Petersburg National Military Park. (16 U.S.C. 423a-1)

SEC. 2. The Secretary of the Interior is further authorized to adjust the boundary of the Petersburg National Military Park through purchase, exchange, or transfer: Provided. That in doing so the total area of the park will not be increased and that such changes become effective upon publication of the description thereof in the Federal Register by the Secretary of the Interior. (16 U.S.C. 423a-2).

An Act to change the name of the Petersburg National Military Park, to provide for acquisition of a portion of the Five Forks Battlefield. and for other purposes, approved August 24, 1962 (76 Stat 403). Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled. That the Petersburg National Military Park, established under authority of the Act of July 3, 1906 (44 Stat. 423a-1, 423b-423h), and enlarged pursuant to the Act of September 7, 1949 (63 Stat. 691; 16 U.S.C. 423a-1, 423a-2), is predesignated the Petersburg National Battlefield. SEC. 2. The Secretary of the Interior, in furtherance of the purposes of the Acts referred to in section 1 of this Act, may acquire by purchase with donated or appropriated funds, exchange, transfer, or by such other means as he deems to be in the public interest,

not to exceed twelve hundred acres of land or interests in land at the site of the Battle of Five Forks for addition to the Petersburg National Battlefield. Lands and interests in lands acquired by the Secretary pursuant to this section shall, upon publication of a description thereof in the Federal Register, become a part of the Petersburg National Battlefield, and thereafter shall be administered by the Secretary of the Interior in accordance with the provisions of the Act entitled "An Act to establish a National Park Service, and for other purposes," approved August 95, 1916 (39 Stat. 535; 16 U.S.C. 1, 2, 3), as amended and supplemented.

SEC. 3. There are hereby authorized to be appropriated such sums, but not more than \$90,000, as are necessary to acquire land pursuant to section 2 of this Act.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, TITLE III-ADDITION OF EPPES MANOR TO PETERSBURG NATIONAL BATTLEFIELD SEC. 313.

- (a) The Secretary is authorized to acquire the historic Eppes Manor, and such other lands adjacent thereto, not to exceed twenty-one acres, for addition to the Petersburg National Battlefield, as generally depicted on the map entitled "Petersburg National Battlefield, Virginia," numbered APMA 80,001, and dated May, 1978.
- (b) There are hereby authorized to be appropriated not to exceed \$2,200,000 to carry out the purposes of this section. Approved November 10, 1978.

### Appendix C: Cost Estimates

This GMP is programmatic: that is, it gives guidance in the form of management prescriptions for future decision making regarding resource protection, interpretation, public use and development. Therefore, the costs provided in this appendix are indicative of the capital and operational costs of implementing the alternatives. They are provided so that reviewers can compare the general costs and benefits of the GMP alternatives. Specific costs for construction and operation would be determined for individual actions after detailed designs are produced.

The capital costs estimated for implementing Alternative B, C and D were calculated using NPS Class C costs. A Class C estimate is a conceptual cost estimate based on square foot and unit costs of similar construction or identifiable unit costs of similar construction items. These estimates were prepared without detailed designs or a fully defined scope of work, since those are not available at this stage of the planning process.

In order to calculate potential acquisition costs for the boundary expansion, the Northeast Region Lands Division prepared a Legislative Cost Estimate for Alternatives B, C and D. A Legislative Cost Estimate is an estimate that outlines the costs associated with acquiring any interest in real property for new park units, proposed park boundary expansions, remainder of tracts to complete existing units, and or changes in estates within existing units. Costs reported in a Legislative Cost Estimate include:

- Estimated real property acquisition and relocation costs on a tract-by-tract basis
- Tax data for Payment in Lieu of Taxes (PILOT) program consideration
- · Appraisal contracts
- Mapping contracts
- Title contracts
- · Surveying contracts
- Environmental Site Assessment contracts
- Other contract work

These costs assume 100% fee acquisition by the NPS. Petersburg NB supports partnership efforts through easements and donations that will contribute to lower acquisition costs. The estimated time period for acquisition of these nationally significant lands is 10-15 years.

### **APPENDIX C**

## **Cost Estimates for Action Alternatives**

COSTS: ALTERNATIVE B	
Annual Operations & Management	
Current Staff	2,236,000
Additional Staff	1,278,000
TOTAL	\$3,514,000
Research, Interpretation, Planning & Construction	
Plan, Design & Build-Improvements for existing resources	6,149,000
Interpretation & Special Resources	611,000
Boundary Expansion-Related Costs (Haz-Mat, RTE, Historic and Cultural Landscape Reports)	1,206,000
TOTAL	\$7,966,000
Land Acquisition Total	\$25,629,000
COSTS: ALTERNATIVE C	
Annual Operations & Management	
Current Staff	2,236,000
Additional Staff	2,242,000
TOTAL	\$4,478,000
Research, Interpretation, Planning & Construction	
Plan, Design & Build-Improvements for existing resources	9,371,000
Interpretation & Special Resources	4,947,000
Boundary Expansion-Related Costs (Haz-Mat, RTE, Historic and Cultural Landscape Reports)	303,000
TOTAL	\$14,621,000
Land Acquisition Total	10,165,000
COSTS: ALTERNATIVE D	
Annual Operations & Management	
Current Staff	2,236,000
Additional Staff	2,442,000
TOTAL	\$4,678,000
Research, Interpretation, Planning & Construction	
Plan, Design & Build-Improvements for existing resources	6,811,000
Interpretation & Special Resources	7,001,000
Boundary Expansion-Related Costs (Haz-Mat, RTE, Historic and Cultural Landscape Reports)	1,206,000
TOTAL	\$15,018,000
Land Acquisition Total	25,629,000

#### **A Dedication**

During his tenure with the National Park Service, John Thomas (Tom) Tankersley set a high standard for those who knew him. As a friend, coworker, and supervisor, he was a leader, inspiring those around him to always take the high road in life. For his guidance and creative vision in a document that provides the same, the Petersburg National Battlefield General Management Plan is lovingly dedicated to his memory. Tom's passion for history and music, his love for life, and most of all his friendship were a gift to all who knew him.